CHAPTER 6

PUBLIC COMMENTS AND RESPONSES

This chapter is new. It displays most of the public comment letters received, a complete list of people and organizations attending one or more of the public meetings at which comments were received and BLM's responses to comments.

All comments, written or oral, were reviewed and considered. Comments that presented new data, questioned facts or analyses, or raised questions or issues bearing directly upon the alternatives or environmental analyses were responded to in this final RMP-EIS. Comments pertaining to wilderness were saved for the wilderness review process and will be evaluated separately. Comments expressing personal opinions and comments and letters received after May 10, 1985, were considered but not responded to directly.

A combined total of 437 people, organizations or governmental agencies submitted comments on the draft RMP-EIS. Of these, 361 separate comments required responses. Of the 361 comments, a total of 61 dealt specifically with wilderness and will be addressed in a separate environmental document in 1986. Table 6–1 displays the number of comments requiring a response by resource category.

Each letter and each public hearing statement has been assigned an index number (see Tables 6–2 and 6–3), and comments within individual letters and hearing statements are also numbered. These same index numbers, along with individual comment numbers, are used to identify BLM's responses to the letters and hearing statements. For example, response 192–2 refers to letter number 192, comment number 2. The letters are reprinted in the order they were received, followed by the public hearing transcripts and, finally, BLM's responses to comments. Some of the letters expressing personal opinion have not been reprinted here, but are grouped together and summarized (see summaries following letters 13, 34, 101, 102, 136 and 231 in the text). These letters are available for review at the Yuma District Office. A response to a comment identifies either that a change has been made in the RMP-EIS or provides rationale why changes were not made.

TABLE 6-1: NUMBER OF COMMENTS REQUIRING RESPONSE, BY RESOURCE
Bureau of Land Management, Yuma District

Resource	Number of Comments*
Wildlife	76
Special Management Areas	43
Grazing	33
Land Ownership Adjustment	19
Rights-of-Way	29
Recreation	53
Wilderness	61
Floodplain	3
Minerals	45
Vegetation	3
Economics/Social	3
Other	42
Total Comments Requiring Response	361

*These numbers cannot be added to total 361 because some comments addressed more than one resource.

Source: BLM, Yuma District Office, 1985.

TABLE 6–2: LETTER WRITERS
Bureau of Land Management, Yuma District

Letter No.	Agency and/or Individual
1	Santa Fe Pacific Railroad Company (G. G. Byers)
2	Arizona State Parks, State Historic Preservation Offices (Donna J. Schober)
3	United Four Wheel Drive Associations (Stu Bengson)
4	Jim Livermore
5	City of Yuma, Planning Division (Kathy F. Lofink)
6	Herb Garlitz
7	State of California, Native American Heritage Commission (Loretta E. Allen)
8	National Park Service, Western Region (Howard H. Chapman)
9	U.S. Marine Corps, Yuma MCAS (Lt. Col. R. J. Stocking)
10	Arizona State University, Center for Environmental Studies (Robert D. Ohmart)

Letter No.	Agency and/or Individual
11	Elliott Bernshaw
12	Harry Melts
13	Mr. and Mrs. Norman Pegues
14	Mr. and Mrs. Robert Hemmert
15	Mr. and Mrs. John D'Orio
16	Mr. and Mrs. A. Learn
17	Mr. and Mrs. Art Iniley
18	Dan Patet
19	Mr. and Mrs. Melvin Jones
20	Mrs. D. P. Cripe
21	Mr. and Mrs. Phil Teljeur
22	Mr. and Mrs. James Dirksen
23	Mr. and Mrs. R. G. Roloff
24	Mr. and Mrs. Robert Jacobson
25	Anonymous
26	Mr. and Mrs. John Simpson
27	Mr. and Mrs. L. M. Rigdon
28	Mr. and Mrs. Earl Archer
29	C. H. Anderson
30	Mr. and Mrs. George Moldenhauer
31	Mr. and Mrs. Lester Mitchell
32	Mr. and Mrs. Ward Carroll
33	Mr. and Mrs. David Childs
34	Jack Devault
35	Lois Tyson
36	Mr. and Mrs. Harry McGee
37	Ray Needham
38	Mr. and Mrs. Fred Humphreys
39	Virgil Van Alstine
40	Mr. and Mrs. Norm Theobald
41	James E. Manley
42	Mr. and Mrs. Elmer Hall
43	Mr. and Mrs. Leslie Bryden
44	Mr. and Mrs. Cameron Page
45	Mr. and Mrs. Roger Dillavou
46	Mr. and Mrs. Don Groff
47	Betty Beck and Luetta Goertzen
48	David R. Hunt
49	Mr. and Mrs. John Spicer
50	Mr. and Mrs. Francis Vogelsberg
51	Mr. and Mrs. Fred Curtis
52	Town of Parker (Town Council)
53	Dick Pruett
54	Pacific Gas and Electric Company (E. L. Nurisso)
55	Department of the Air Force, Western Region (Phillip E. Lammi)
56	Mr. and Mrs. Votis Minium
57	Mr. and Mrs. F. Montgomery
58	Mr. and Mrs. A. A. Harris
59	Mr. and Mrs. Ernest Romey
60	Mr. and Mrs. George Culbert
61	Mr. and Mrs. Marcel Caron
62	Mr. and Mrs. Frank Steviac
63	State of California, Native American Heritage Commission (John D. Smith)
64	Lothar M. Schmidt
65	Larry Van Dusen
66	Mr. and Mrs. Virgel Tharp
67	Mr. and Mrs. F. R. Slimmer
68	Congressman Bob Stump
69	Jesse G. Scott
70	R. D. Cooper

Letter No.	Agency and/or Individual
71	Brian R. Cowger
72	John MacDonald
73	E.V.E. Mining Enterprise (Harry Smith)
74	John R. Wildon
75	Mr. and Mrs. Everest Lilje
76	Mr. and Mrs. Pat Cole
77	Mr. and Mrs. Pete Parga
78	James Everett
79	Richard Cooke
80	Walter H. Pappin
81	Roland J. Chalifour
82	Mr. and Mrs. Ralph Beday
83	Mr. and Mrs. Don Salmen
84	Jack Dolan
85	Kenneth W. Furra
86	Mr. and Mrs. Eldar Miller
87	W. C. Salodin
88	J. P. Herz
89	Wally Sisler
90	Mr. and Mrs. David T. Zegler
91	Arizona Bureau of Geology and Mineral Technology (Larry D. Fellows)
92	Bobbie Holaday
93	Mr. and Mrs. Rodney Isaacson
94	Mr. and Mrs. Frank Braunschweig
95	SCORE International (Sal Fish)
96	MCI (Fred Hubbell)
97	Frederick W. Fish
98	Bert W. Gossett
99	Richard Alexander
100	E. Anderson
101	Mrs. Gene Anne Parker
102	Janice C. Luepke
103	Donald M. Currie
104	Harry Oliverius
105	Mr. and Mrs. John J. Gunkel
106	William A. Facinelli
107	Mr. and Mrs. J. E. Lilly
108	Mr. and Mrs. John Rich
109	Ida May Oliverius
110	Rosemary P. Spaulding
111	John Prater
112	Leroy Zimmerman
113	Frank S. Loulan
114	Eloise G. Black
115	M. K. Daly
116	Nancy L. Russell
117	Scott Hudson
118	Robert J. Schmidli
119	John T. Winter
120	Walter A. McCleneghan
121	Dan Ayers
122	Sara Traum
123	Nancy Tubey
124	John S. Jachna
125	Karl Greenblatt
126	Greg Barr
127	John F. Pamperin
128	J. T. Zahnle III et. al.
129	Petty Ann Doty
130	Majorie Woodruff
131	Rose Marie King

Letter No.	Agency and/or Individual
132	J. Salty Honcharik
133	Dora Newman-Samuels
134	D. Scott Samuels
135	Mr. and Mrs. Flynn C. Kelly
136	Mr. and Mrs. Fred Salinger
137	Mary Sojourner
138	Mr. and Mrs. Eddie Bennett
139	Richard Faith
140	Dorothy Lees Riddle
141	Phil Briggs
142	Four Corners Wilderness Workshop (Donavon H. Lyngholm)
143	Petition (Glenn I. Biddle; 137 signatures)
144	Mr. and Mrs. L. H. Chatham
145	Sue Baughman
146	Walter's Camp, Inc. (Frank A. Dokter)
147	Neil J. Klemek
148	Mrs. George Vlassis
149	Mr. and Mrs. Clayton Dahlman
150	Marcia Colliat
151	Rebecca P. Allison
152	Bettina Bickel
153	State Representative Robert J. "Bob" McLendon
154	Yuma County (Andrew O. Torres)
155	Mr. and Mrs. Burton Nagel
156	Palo Verde Irrigation District (Gerald M. Davisson)
157	Palo Verde Valley Rod and Gun Club (Jack Page)
158	Lillian A. Santamaria
159	Henry and Joy Schultz, Hope Weisbach
160	Ann S. Johnson
161	Mr. and Mrs. Fred Nelson
162	J. Lorenzini
163	Nancy Stevenson
164	Victoria M. Schiffer
165	Larry Langstaff
166	Bob Wirth
167	Kevin J. Fernlund
168	Joseph M. Califf, Jr.
169	Lillian Longley
170	Elizabeth Bruch
171	Herb McReynolds
172	Mr. and Mrs. Charles Buhler
173	Arizona State Land Department (Robert K. Lane)
174	Burnet F. Wohlford
175	Holly Carman
176	Mr. and Mrs. V. T. Robertson
177	Annette Emig
178	Mr. and Mrs. Earl Heineken
179	CoCo Savage
180	Havasu Heights Ranch and Development Corporation (Robert E. Klemm)
181	Arizona Department of Transportation, Highways Division (Philip A. Shucet)
182	Rhoda V. Varn
183	Sidney M. Hirsh
184	John E. Earl
185	Tris M. and Molly C. Coffin
186	Gene I. Wendt
187	International Boundary and Water Commission (D. D. McNealy)
188	Parker Area Chamber of Commerce (Dorothy Randall)
189	Robert A. Kerry
190	Rick Sudemann
191	Linda Schnabel Stitzer
192	Defenders of Wildlife (Steve Johnson)
193	Mr. and Mrs. Joe Key
194	Wallace J. Gibbs
195	Central Arizona Water Conservation District (John E. Simmons)
196	National Parks and Conservation Association (Russell D. Butcher)
197	U.S. Bureau of Mines (William Cochran)
198	Nancy G. Shacklett
199	Richard Pruett
200	La Paz County Board of Supervisors (Donald D. Denton)
201	Colorado River Board of California (Vernon E. Valantine)
202	Gold Fields Mining Corporation (William C. Feirn)
203	Buck Burdette
204	Kathryn A. Michel
205	La Paz County Board of Supervisors (A. J. Percuoco)
206	Mr. and Mrs. Paul C. Bosch
207	University of Arizona Range Task Force (Del W. Despain)
208	Black Meadow Landing on Lake Havasu (George H. Field)
209	Colorado River Development Association (Phil Younis)
210	California Department of Conservation (Dennis J. O'Bryant)
211	Sarah RPK. Hepburn et. al
212	Yuma County Water Users' Association (Barrett Kehl)
213	George F. Davis Cummings
214	U.S. Fish and Wildlife Service, Kofa National Wildlife Refuge (Milton Haderlie)
215	The Wildlife Society, Arizona Chapter (W. G.. Kepner)
216	Arizona Desert Bighorn Sheep Society, Inc. (Stephen M. Williams)
217	John R. Swanson
218	Department of Energy, Western Area Power Administration (G. J. Giles)
219	U.S. Fish and Wildlife Service, Imperial National Wildlife Refuge (Claire S. Caldes)
220	San Diego Gas & Electric (J. C. Barnett)
221	Kathryn A. Michel
222	Dan Fischer
223	Wildlife Management Institute (Daniel A. Poole)
224	Colorado River Development Association (Phil Younis)
225	Steve Nelson and John Pechous
226	Jeff D. Dorroh
227	Petition (Yuma Gem and Mineral Society; 46 signatures)
228	Yuma Audubon Society (Cary W. Meister)
229	Wellton-Mohawk Irrigation and Drainage District (C. L. Gould)
230	City of Yuma, Special Services Department (Gwen Robinson)
231	Mr. and Mrs. Frank Lynn and L. Steve Bell
232	James L. Smith
233	Dale Johnson
234	Pete Peterson
235	Douglas D. Hunt
236	Gary P. Howard
237	William Illingworth
238	Opal Illingworth
239	Cay Cousin
240	L. C. Miller
241	Clinton F. Huntoon
242	Michael R. Thompson
243	Marlene Wilson

Letter No.	Agency and/or Individual
244	Mr. and Mrs. John Whitson
245	R. L. Brauaman
246	Paul E. Neff
247	P. W. Thompson
248	Emile Claude
249	K. O. Sherwood
250	Deloris Harrington
251	Gene Mrotek
252	R. R. Palmer
253	Fred Williams
254	Louis C. McHenry
255	Name illegible—from Chandler, Arizona
256	Gene A. Vesely
257	Randi Shumway
258	T. H. Schroeder
259	James Heeringa
260	Ralph F. Griffin, Jr.
261	C. R. Hafford
262	Colorado River Indian Tribes (Shute, Mihaly & Weinberger, Counsel for CRIT; Alletta d'A Belin)
263	La Paz County Board of Supervisors (Donald D. Denton)
264	Daryl Romeyn
265	Arizona Mining Association (R. J. Pursley)
266	Arizona State Land Department (Robert K. Lane)
267	Mr. and Mrs. Walter Pelech
268	The Desert Tortoise Council (Daniel C. Pearson)
269	U.S. Environmental Protection Agency, Region IX (Charles W. Murray, Jr.)
270	Jack Denton
271	Riverside County Planning Department (Jerry Jolliffe)
272	Mr. and Mrs. Vincent Roth
273	Mr. and Mrs. Glenn Abbott
274	John F. Mediz
275	Robert D. Hamilton
276	William L. Burney
277	Mr. and Mrs. Willie Krueger
278	Ernest Fetzer
279	Orrell Mae Stedman
280	John Blankenship
281	Edward J. Collins
282	James L. Collins
283	R. Stoughton, Jr.
284	D. Twitetell
285	Eula Belle Bohme
286	Kendrick Holiday
287	Elizabeth F. Palmer
288	M. G. Bush
289	Thomas J. Furqueran
290	Ruth White
291	Hondo Dunn
292	Glenna C. Auld
293	Dottie M. Williamson
294	Harry Williamson
295	James Q. Rice
296	Steve Henderson
297	Arley Escapule
298	Wayne Winters
299	Bailey Escapule
300	Joyce T. Wright
301	Vijaye S. Wilkes
302	Arthur J. Graves
303	David Johnson
304	Dolores K. Uker
305	William E. Bohme
306	Susan Thompson
307	Charles Swab
308	Richard Kendall
309	U.S. Nuclear Regulatory Commission (James P. Knight)
310	Valerie Peyson
311	U.S. Fish and Wildlife Service (Gilbert D. Metz)
312	Colorado River Development Association (Phil Younis)
313	Robert R. Aker
314	Charles J. Campbell
315	Edward H. Murphy
316	Army Corps of Engineers, Los Angeles District (Carl F. Enson)
317	Southern California Edison Company (Dale L. Woodward)
318	Mr. and Mrs. Jonathan Sams
319	Geoffrey Platts
320	Arizona R.V. & Campers Park Association (Barbara A. Duncan)
321	Matt McWenie and Ken Bunch
322	Randall Sowa
323	Mrs. Sherry Gillingham
324	P. A. Nisbet
325	Joan Ridder
326	Arizona Game & Fish Department (Bud Bristow)
327	George E. Johnston
328	David M. Band
329	Mary C. Nemtin
330	Jane C. Spencer
331	Richard A. Coxhead
332	Donald A. Braun
333	Mr. and Mrs. Ross Wolff
334	Cecily C. Grange
335	Jule Drown
336	Helene Unland-Ringel
337	L. E. Spesard
338	Linnea Holland
339	William A. David
340	James S. Greene
341	Mark Sterkel
342	Gene R. Ralph and Gary O. LaRose
343	Arizona Wildlife Federation (Ace H. Peterson)
344	J. M. Myers
345	Mr. and Mrs. S. Alberto Castaneda
346	William Beaver
347	Clark S. Atkinson
348	Edward P. Klohe
*349	B. Larsen
350	David Mishki
351	Heather S. Hatch
352	The Resources Agency of California (Gordon F. Snow)
353	David Adams
354	Mohave County Board of Supervisors (Jerry A. Holt)
355	Arizona State Parks (Michael A. Ramnes)
356	Ruth G. M. Clay
357	Diana Spencer
358	Carroll R. Munz
359	Ed Bramel
360	Abigail Hagler
361	Kenneth E. Root
362	Patricia Gahagan
363	Robert Wharton, Jr.

Letter No.	Agency and/or Individual	Letter No.	Agency and/or Individual
364	Alma Greene	367	Marcus Jernigan
365	Jim Hutton	368	Vincent Semonsen
366	Bureau of Reclamation, Lower Colorado Regional Office (Roy D. Gear)	369	Mr. and Mrs. Tucker Burling
		370	Karen S. Moses

*Letters numbered 349-370 were received too late to be responded to in the final RMP-EIS, but they will be considered in our decision-making process.

Source: BLM, Yuma District Office, 1985.

TABLE 6-3: SPEAKERS AT PUBLIC HEARINGS
Bureau of Land Management, Yuma District

Speaker No.	Name	Speaker No.	Name
	Lake Havasu City, Arizona - February 26, 1985	B27	Lily Heatly
A 1	Town of Parker (Bruce Jacobson)	B28	Charles Heatly
A 2	Town of Parker (Gerald Hunt)	B29	Frank Dokter
A 3	SCORE International (Sal Fish)	B30	Betty Conzelmann
A 4	Bill Charnley	B31	Chet Hunt
A 5	Herb Garlitz	B32	Samual Heflin
A 6	Gordon Gilbertson	B33	C. Dean Houghtelin
A 7	Dorothy Moerike	B34	Doris Parker
A 8	August Moerike	B35	Allen C. Bridge
A 9	Parker Area Chamber of Commerce (Dottie Randall)		
A10	George F. Davis Cummings		**Yuma, Arizona - February 28, 1985**
	Blythe, California - February 27, 1985	C 1	P. A. Birdick
		C 2	Ken Omey
B 1	Dave Robb	C 3	Maynard Campbell
B 2	Joe Gabler	C 4	Les Bunde
B 3	Colorado River Indian Tribe (Charles Lamb)	C 5	Walter Wooley
B 4	Earl Wickersham	C 6	Paul Kubinski
B 5	Marie Wickersham	C 7	Dean Haughtelin
B 6	Bill Chrestman	C 8	U.S. Marine Corps (Bradley Baird)
B 7	Clarence Gracely	C 9	Leslie Kumler
B 8	Margaret Gracely	C10	Owen Londberg
B 9	Don McKay	C11	Mountain Bell (Don Smith)
B10	E. W. Beck	C12	Mountain Bell (Bob Followwill)
B11	Helen Beck	C13	Arizona Small Mining Operators' Association (Janel Smith)
B12	Hazel Vincent		
B13	Don Todd	C14	Yuma Audubon Society (Kathryn Michel)
B14	Martin Jorde	C15	Michael McBride
B15	Bob Todd	C16	International Boundary and Water Commission (Bob Bond)
B16	Nathan Johnson		
B17	Marilyn McFate		
B18	John McFate		**Phoenix, Arizona - March 5, 1985**
B19	Bertha Boucher		
B20	Geneva Allread	D 1	Drew Crook
B21	Leslie McWethy	D 2	Arizona Wilderness Coalition (Joni Bosh)
B22	Walt Ketchum	D 3	Arizona Mining Association (Jack Pursley)
B23	O. J. Wikstrom	D 4	Arizona Commission of Agriculture and Horticulture (R. A. Countryman)
B24	W. E. Boston		
B25	David Trenholm	D 5	Caroline Butler
B26	Jack Brock	D 6	Tom Wright

Source: BLM, Yuma District Office, 1985.

Letters

1

Santa Fe Pacific Railroad Company

A SANTA FE INDUSTRIES COMPANY
P.O. Box 3588
Albuquerque, New Mexico 87190
(505) 262-2211

January 24, 1985

Mr. J. Darwin Snell
District Manager
U. S. Bureau of Land Management
P. O. Box 5680
Yuma, Arizona 85364-0697

Dear Mr. Snell:

Santa Fe Pacific Railroad Company wishes to respond to the Draft Yuma District Resource Management Plan and Environmental Impact Statement.

1 Santa Fe Pacific Railroad Company is the owner of about 215,000 acres of reserved mineral estates and 5,760 acres of fee lands within the Yuma District. This substantial land holding position and its potential impacts on the BLM's plans for resource management have not been fully addressed in the Draft Plan. For instance, all discussions of the land and minerals ownership adjustment program do not discuss whether Santa Fe Pacific lands are being considered for acquisition in Gibraltar Mountain, the Bill Williams Mountains, or Swansea,
2 e.g., p.10. Nor do any discussions of impacts on mineral and energy resources discuss the effects the Draft Plan would have on Santa Fe Pacific's lands.

Santa Fe Pacific has earlier pointed out to the Yuma District that all BLM planning and EIS documents must recognize Santa Fe Pacific's fee mineral ownership, its rights to access thereto, and its rights to explore for and develop its mineral and land resources. Santa Fe Pacific's fee mineral ownership includes the right to use so much of the surface as is reasonably necessary to develop the minerals and realize economic value of the mineral estate. The BLM must acknowledge that the Interior Board of Land Appeals has ruled (IBLA 81-11, and IBLA 81-1072, decided May 6, 1982) that where the mineral estate is owned in fee simple by a private party such as Santa Fe Pacific, the mineral estate is a "vested right" as distinguished in Public Land Law terminology from a "valid existing right." Vested rights are therefore superior to valid existing rights and are unalterable from exercise of Secretarial discretion or regulation. Thus, any BLM proposals for the areas mentioned above and other lands in which Santa Fe Pacific owns any interest must first address the private ownership.

Mr. J. Darwin Snell
January 24, 1985
Page -2-

Santa Fe Pacific supports the BLM in its efforts to manage the public lands. However, any resource management plans which will result in restrictive surface management practices such as the creation of Areas of Critical Environmental Concern, Outstanding Natural Areas or other designations, must recognize Santa Fe Pacific's fee mineral ownership and cannot impede or impair our rights to access, entry to, and development of these lands.

With the reservations noted above, Santa Fe Pacific supports the Preferred Alternative. Thank you for this opportunity to comment.

Very truly yours,

G. G. Byers
Director, Public Affairs

GGB:gem

cc: J. T. Williams
G. R. Wagner

2

ARIZONA STATE PARKS

1688 WEST ADAMS STREET
PHOENIX, ARIZONA 85007
TELEPHONE 602-255-4174

BRUCE BABBITT
GOVERNOR

STATE PARKS BOARD MEMBERS

PRISCILLA ROBINSON
CHAIR
TUCSON

GWEN ROBINSON
VICE CHAIR
YUMA

REESE G. WOODLING
SECRETARY
TUCSON

ELIZABETH A. DRAKE
PHOENIX

DUANE MILLER
BISBEE

RAY MOLERA
NOGALES

ROBERT K. LANE
STATE LAND COMMISSIONER

MICHAEL A. RAMNES
DIRECTOR

ROLAND H. SHARER
DEPUTY DIRECTOR

January 30, 1985

Planning Team Leader
U.S. Department of Interior
Bureau of Land Management
Yuma District Office
P. O. Box 5680
Yuma, Arizona 85364-0697

Re: Draft EIS and Yuma District Resource Management Plan
1601 (YDO)
DOI-BLM

Dear Sir or Madam:

I have reviewed the draft report submitted for the above project. The report appears to consider adequately the cultural resources of the project area at this stage of investigation. Pursuant to 36 CFR, Part 800 of the Advisory Council's regulations ("Protection of Historic and Cultural Properties"), we look forward to continuing the consultation process regarding the cultural resources of this project.

We appreciate your cooperation with this office in complying with the historic preservation requirements for federal undertakings. If you have any questions about any of this, please contact me at (602) 255-4174.

Sincerely,

Teresa L. Hoffman
Archaeologist

for Donna J. Schober
State Historic Preservation Officer

TLH:rmj

CONSERVING AND MANAGING ARIZONA'S HISTORIC PLACES, HISTORIC SITES, AND RECREATIONAL, SCENIC AND NATURAL AREAS

3

UNITED FOUR WHEEL DRIVE ASSOCIATIONS
of U.S. and CANADA
8900 N. Camino de Anza Tucson, AZ 85704

Mr. Dennis Turowski, Planning Team Leader
Bureau of Land Management Yuma District - USDI
P.O. Box 5680
Yuma, AZ 85364-0697

Feb. 12, 1985

Dear Mr. Turowski:

Thank you for the opportunity to comment on your "Yuma District Draft RMP & EIS". I found your preferred alternative to be most acceptable and commend you for a job well done. Throughout your entire analysis of alternatives and resource management decisions you displayed a great deal of professional expertise as well as sound logic.

The only item I found lacking in your DEIS was adequate mention that "wilderness" values can be protected and managed even under multiple-use management. I know that existing regulations & your professional abilities will insure that any unique values areas have that were not selected for "wilderness" will be cared for. However, the lay public is left with a perception at least that multiple-use will degrade the "wilderness" values unless absolutely protected under the title of "wilderness". I wish you would more clearly spell out your range of jurisdiction to the public to alleviate any fears they may have and the possibility of future reaction to your management decisions.

I hope my comments are constructive in helping you in the future. If there is any question I can answer for you, or be any assistance please get in touch with me.

Sincerely,

Stu Bengson
Director, Land-Use
UFWDA

CC: AZ Assoc 4WD Clubs
Dean Bibles, St. Dir. BLM

RESPECT...PROTECT...AND ENJOY: LAND, WATER, MOUNTAINS, AND SUN RESOURCES

4

livermore & associates, inc. • 1749 n. garey ave. • p.o. box 2449 • pomona, ca. 91766 • (714) 629-4001
(800) 472-1784

February 5, 1985

J. Darwin Snell
Bureau of Land Management
P. O. Box 5680
Yuma, Arizona 85364-0697

Dear Mr. Snell:

Thank you for sending me the draft copy of the Yuma District Resource Management Plan and EIS. I would prefer the Bureau adopt Alternative B which is Resource Production. I see a great need for expansion for utilities and their corridors and communication sites along with a severe need for recreation areas. Leases to the private sector for recreational development along the Colorado River should receive a high priority. There are several areas which could be opened up for more intensive recreational use. Those being land along the Colorado River north of Interstate 40 and the Lake Havasu area and areas south of Vidal Junction.

There is also a strong need to provide large areas for off-highway vehicle (OHV) recreation. The OHV recreation plan as described in Alternative B is still a little short on acreage.

I am concerned with the riparian areas shown on page 13. Numbers 5 & 7 account for more than 7 square miles of land which might be better used for recreation and camping rather than a wildlife priority area.

Anything that can be done with the plan to further active use of our resources I support. Thank you in advance for your cooperation and assistance.

Sincerely,
LIVERMORE & ASSOCIATES, INC.

Jim Livermore

JL/cl

agents and brokers • founded 1945 • insurance and bonds

6

Herb Garlitz
1413 Pearl Circle RR 1
Bullhead City, AZ 86430

FEB 1985 RECEIVED Havasu R.A. BLM

Feb. 21, 1985

Mr. James May, Area Manager
Bureau of Land Management
Sweetwater & Oro Grande
Lake Havasu City, AZ 86403

Dear Mr. May,

Enclosed find a resume of what I would like to present at the hearing on February 26.

I took my undergraduate degree in forestry and range management prior to World War II. After returning from Germany in 1945 I did graduate study in range ecology at Colorado State University (then Colorado A & M). Afterwards I worked six years as a Range Conservationist with the U.S. Soil Conservation Service in far West Texas desert country, much like Western Arizona.

I plan to come to the hearing with some friends who are also members of the Arizona Desert Bighorn Sheep Society. I belong to the Arizona Wildlife Federation and have been a regular contributor to the Arizona Wildlife News. We are coming as individuals and not as representatives of any organization.

Sincerely,

Herb Garlitz

Encl.

5

CITY OF YUMA

Planning Division
3 West Third Street
Territorial Mall
Yuma, AZ 85364-2292
(602) 783-1271, Ext. 265

February 15, 1985

J. Darwin Snell
Bureau of Land Management
Yuma District Office
P. O. Box 5680
Yuma, Arizona 85364-0697

Dear Mr. Snell:

The City of Yuma has reviewed the draft Resource Management Plan and Environmental Impact Statement and would like to comment on Social Characteristics, Population Trends on page 74. According to the Bureau of Census, the population for the City of Yuma in 1970 was 29,007 and in 1980 was 43,057. The population numbers that are in the chart for the City of Yuma include the entire Yuma Division which reflects a substantial amount of people not located within the city limits.

1 In reference to your footnotes, Report 12 by the Arizona Department of Economic Security (DES) is an obsolete report and Report 81 P-1 is with the California Population Research Unit (not the Department of Economic Security).

Attached are the most recent population projections from DES. There is a slight discrepancy in projected population for the year 2005 for both the City and the County of Yuma. The population statistics were our main concern. The physical geography of the areas in the draft report are a considerable distance from Yuma and hence the impacts would be minimal.

Thank you for your consideration in this matter.

Sincerely,

Kathy F. Lofink

Kathy F. Lofink,
Planner II

KFL:shs

Enclosure (1)

UTILIZATION OF FORAGE ON THE
LOWER RAINFALL DESERT RANGELANDS

Grazing of domestic livestock on desert ranges of Western Arizona, where the average annual rainfall is less than 7 inches, has historically been economically marginal at best, but often economically submarginal over the long haul.

Since our society does not need more beef production than the established livestock industry can supply by regular methods that are more economically sound,

and since the influx of people into Western Arizona is increasing the recreational and esthetic values of our desert rangelands,

and since there is no reasonable opportunity for private graziers to profit sufficiently in order to make substantial contributions to public tax rolls,

and since we believe that grazing fees paid will be of substantially less value to the public than will be the public loss in esthetic and recreational values,

and since the presence of cattle on desert ranges detracts from the enjoyment of photography, hiking, hunting, backpacking, rock hunting, bird watching, and camping,

and since Brahman cross cattle may pose a threat to people who are using the desert for recreational pursuits,

and since there is some evidence that cattle brought in, especially from Mexico, have introduced pathogens that are detrimental to the native bighorn sheep,

and since past experience shows that steers brought in to utilize the annual weeds and grasses that spring up following wet seasons have been left on the range until they overuse and damage the perennial forage plants that the native mule deer and bighorn sheep depend upon,

and since desert forage plants have not evolved growth characteristics that can withstand the robust foraging habits of large animals,

Page 2 - UTILIZATION OF FORAGE. . . .

and since such plant characteristics have evolved to withstand the more dainty foraging of native sheep and deer that graze lightly over great distances, compared to cattle which graze heavily over short distances,

we believe that the ecology of the lower rainfall desert areas cannot successfully withstand the grazing of large domestic or feral animals and that commercial livestock grazing should not be one of the legitimate multiple uses of such land.

We support moderate and well managed grazing of domestic cattle on BLM lands that lie in areas that receive more than 7 inches of average annual rainfall.

Feral burros have teeth in both the upper and lower jaw. These animals graze and forage by breaking and tearing and often destroy more forage than they consume. They have caused an ecological disaster on some of the Western Arizona desert sheep ranges. We urge the BLM to work through Congress toward the complete elimination of these barnyard animals gone wild from all desert sheep ranges.

Herb Garlitz

8

United States Department of the Interior
NATIONAL PARK SERVICE
WESTERN REGION
450 GOLDEN GATE AVENUE, BOX 36063
SAN FRANCISCO, CALIFORNIA 94102

IN REPLY REFER TO:
L7619 (WR-RPE)

February 21, 1985

Memorandum

To: District Manager, Bureau of Land Management, Yuma

From: Regional Director, Western Region

Subject: Draft Resource Management Plan and Environmental Impact Statement, Yuma District Planning Area, Arizona (DES 85/1)

In accordance with your recent letter of transmittal, we have reviewed the subject plan and have the following comments.

Cultural Resources

1. Page 53

1 (a) It is stated that there are 876 recorded cultural sites, yet page 55 indicates 1,200 sites are recorded in the Yuma BLM District. Which is correct and how many of the recorded sites are historic resources? Why are sites recorded that are not on BLM land? Are any of the non-BLM sites on the Yuma Proving Ground?

2 (b) The following statement requires clarification: "Nearly all cultural remains in the Yuma District are open terrace sites, including all cultural period artifacts and features mingled together on the surface." Does the latter clause refer to deflated cultural deposits or, if not, to what does it refer?

3 (c) The inference is that all known sites are surface only. Recent work with desert sites at Fort Irwin, California, and Rye Patch Reservoir, Nevada, suggest that stratified sites do occur in a desert context. Are there no known midden sites at all? (For example, pages 101, 107, 114, and 129 all mention "village sites" as opposed to temporary camps. The former site type frequently has midden or stratified deposits.)

2. Page 54

4 What do sites in the "low sensitivity" area consist of and how are sites in this type of area dealt with?

7

STATE OF CALIFORNIA — GEORGE DEUKMEJIAN, Governor

NATIVE AMERICAN HERITAGE COMMISSION
915 Capitol Mall, Room 288
Sacramento, California 95814
(916) 322-7791

B.L. DISTRICT
FEB 25 11 ... '85
YUMA

February 19, 1985

Planning Team Leader
U.S. Department of the Interior
Bureau of Land Management
Yuma District Office
Post Office Box 5680
Yuma, Arizona 85364-0697

RE: Yuma District Resource Management Plan EIS

Dear Planning Team Leader:

On behalf of the California Native American Heritage Commission, I appreciate the opportunity to express its concerns and comments in the environmental review process. As you may be aware, the Commission is mandated to preserve and protect Native American cultural resources pursuant to Section 5097 et seq. of the Public Resources Code.

The Commission has the further responsibility of assisting Native Americans in cemetery and burial protection pursuant to Section 5097.94(k) of the Public Resources Code. Should human remains of Native American origin be encountered, we request that the County Coroner's Office be contacted pursuant to the procedures set forth in Section 5070.5 of the Health and Safety Code.

Having reviewed the EIS for this management plan, I appreciate your solicitation of comments from the Native Americans in or adjacent to the project area, and feel confident that their comments and concerns will be duly considered in preparation of the final EIS.

Should Native American cultural resource issues arise, please do not hesitate to contact me or my staff.

Thank you again for soliciting our input.

Sincerely,

Loretta E. Allen
Executive Officer

LE:JS:gq

2

3. Page 55

5 (a) It is noted that only 33 sites (out of 1,200) are on or eligible for nomination to the National Register of Historic Places. It is inconceivable that 97% of the recorded sites have no potential at all to tell us something about the prehistory of the area in terms of the evaluation criteria noted in Appendix J, page 267.

6 (b) Are any of the 1,200 recorded sites on the Yuma Proving Ground?

4. Appendix J, page 267 - Methodology for Evaluating Cultural Resources.

7 (a) Does BLM-Yuma have a Cultural Resources Management Plan? If so, it should be cited.

8 (b) Appendix J is weak in its treatment of historic sites and historic archeology and should be expanded upon.

9 (c) The methodology and procedural requirements for dealing with cultural resources includes more than "evaluation."

10 (d) Page 267, Socio-cultural Use: This should note actual Native American consultation regarding ARPA permit actions, as well as sacred and religious site consultations.

11 (e) Page 267, Management Use: How does the BLM select a particular site for experiments in stabilization, etc., and what legal procedures must be followed prior to a site's being used for experimental or test purposes?

Howard H. Chapman

cc:
IAS
WASO (762)

9

UNITED STATES MARINE CORPS
U.S. MARINE CORPS AIR STATION
YUMA, ARIZONA 85369-5001

IN REPLY REFER TO:

11000
3AS
25 FEB 1985

District Manager
Bureau of Land Management
Yuma District Office
P.O. Box 5680
Yuma, AZ 85364-0697

Gentlemen:

I am in receipt of a draft copy of the Resource Management Plan (RMP) and Environmental Impact Statement (EIS) for the Yuma District Planning Area. From a review of this document, it was noticed that overflights by military aircraft has not been addressed. It should be noted that at least 16 low level training routes traverse the Yuma District Planning Area between Yuma and Bullhead City.

This Command is also in receipt of copies of the Lower Gila South RMP/EIS and the Phoenix Wilderness EIS Area Drafts. Both of the documents allow "the use of aircraft where their use has been established...etc." and contains a statement to the effect which reads:

> Military Training Overflight. The U.S. Air Force, Marine Corps, and various military units conduct occasional high-speed and low-level training flights over the WSAs in the EIS area. Military aircraft fly as low as 100 feet in these areas. Flight above a particular WSA can vary greatly because military training routes and mission requirements change frequently. Noise complaints and avoidance of general aviation use areas has relegated low-level and high-speed training flights to the remote and sparsely inhabited areas where the WSAs are located.

It is requested that a similar statement be added to the Yuma District RMP/EIS for the continued, uninterrupted, essential military low-level overflights of this area. Your assistance and cooperation in this matter is appreciated.

Sincerely,

R. J. STOCKING
Lieutenant Colonel, U.S. Marine Corps
Executive Officer
By direction of the
Commanding Officer

Preface to the Comments of Robert D. Ohmart on:

The Bureau of Land Management's Yuma District Resource Management Plan

11 February 1985

Prior to the development and execution of any good land management or environmental impact document, two items are essential for its success: (1) an in-depth inventory of the natural resources to be managed, and (2) enforcement capabilities to insure that rules and regulations are enforced. Both of these essential items are lacking for the Yuma District Resource Management Plan of the Bureau of Land Management.

1 In-depth resource information is needed so that management priority can be focused on unique or limited natural resources to insure that they are conserved on public lands for future generations to use and enjoy. Federal and state-listed species may be present in an area yet unknown to land managers. Without knowledge of the whereabouts of these biological resources and listed plants or animals, the habitat values essential to their survival can possibly be lost through other multiple-use activities (grazing, ORV's, campers, woodcutters, etc.).

2 Strict enforcement follows the natural resource inventory process, planning and development of management strategies and formation of regulations. Without regulations and enforcement authorities, the best-developed management plans are sure to fail or fall miserably short of their intended goals.

For these reasons, I view the BLM Yuma District RMP as a virtual failure unless some enforcement can be added in the very near future. There are unquestionably some very high natural resource values

10

ARIZONA STATE
UNIVERSITY — TEMPE, ARIZONA 85287
CENTER FOR ENVIRONMENTAL STUDIES

February 11, 1985

Mr. J. D. Snell
Bureau of Land Management
Yuma District Office
P.O. Box 5680
Yuma, Arizona 85364-0697

Dear Mr. Snell:

Enclosed are my comments on the draft of the Yuma District Resource Management Plan. Thank you for the opportunity to comment on the draft RMP and I strongly support much of the Plan, but feel that areas of wilderness were omitted that should have been included. More emphasis should also be placed on obtaining as much riparian habitat along the Colorado River as possible.

My two biggest concerns with the Plan are: (1) lack of any in-depth plant community and wildlife inventories to depict what is in the District, how many and where; and (2) the lack of any Rangers in the District to enforce regulations. Addition of Rangers must be accomplished immediately if the RMP and the established regulations are to have any true meaning.

If you need external support to obtain Rangers and I can help, please let me know.

Best wishes,

Robert D. Ohmart, Ph.D.
Associate Director

RDO/cdz

localized over the District that are unknown, possibly never be known, and will remain so or even be lost prior to in-depth resource inventories. It is probably the greatest tragedy of mankind that we continually place mineral and financial wealth over our own ecological health and natural resource values.

COMMENTS ON THE DRAFT YUMA DISTRICT RMP

Submitted by Robert D. Ohmart

11 February 1985

Riparian Areas

3 **Page 13:** The 1,500 acres of land along the Gila River resulting from Wellton-Mohawk-BR exchange.

Your RMP states that you will administer these lands and manage them as priority wildlife areas. Is this in name only? I would like to see it spelled out more specifically how BLM plans to manage these lands.

4 Also, will BLM have management responsbility over the river channel and adjacent lands?

It is great to see BLM acknowledge these valuable wildlife areas and give them priority status, but exactly what does this mean in management or is it only on paper?

5 The 3,880 acres identified by your RMP along the Colorado River shouth south of Yuma are under pending legislation for transfer to the Cocopah tribe (see article by Joyce Christis in The Yuma Daily Sun). This transfer is almost sure to be made, but no mention is made of this in your RMP. Your declaration under the proposed alternative indicates these important wildlife habitats will remain in federal lands, which makes me question the value and sincerity of long-range planning.

Bighorn Sheep Use Areas

Pages 13 and 14: The approach of managing 296,960 acres of bighorn sheep year-long habitats as priority wildlife areas is excellent as is the inclusion of the corridor and closing the lambing grounds on a seasonal basis.

on line. Also, these areas should be revegetated with the most valuable wildlife habitats (cottonwoods and willows) if salinity levels are low enough to support maximum growth.

Recreation

Page 18: There should not be any further developments for recreation in floodplain areas, especially priority riparian areas. Further access into riparian areas should be stopped and no new camping areas for visitors developed.

Length-of-Stay

8 **Page 20:** These regulations must be enforced by BLM Rangers. Unless this is done the regulations are meaningless.

Winter Visitors

Page 20: BLM should not develop any more LTVA's. They should also enforce the boundaries on those in operation and enforce the length-of-stay regulations. You would find that enforcement would provide more available spaces without further development.

ORV

9 **Page 20:** Restriction of ORV use to existing roads and trails is good, but southern California is a classic example of how the desert and its value can be destroyed without enforcement. How are these regulations to be enforced without Rangers on the District?

10 Also, what is the District's definition of roads and trails -- does this include washes? This should be spelled out in the final, and washes should be excluded because of the damage to wash vegetation and harrassment to wildlife, especially desert mule deer.

Unique Natural Areas and Features

6 **Page 14:** Under Alternative A (present situation under the Management Framework) you list six areas (see p. 15) that were listed as being worthy of some special management status. Yet these were not carried through under the present RMP. I hope BLM is not abandoning the special management area concept or demonstrating a reluctance to protect unique values on public lands in Arizona. The phrase "special management prescriptions" sounds more like lip service and less like good sound management.

Grazing: Authorized Use

Page 16: Domestic livestock grazing should be totally eliminated from the Cactus Plain because of the unique natural values, land sensitivity, and wildlife values. Further, there should not be any new development allowed except fencing to prevent range cattle from the adjacent allotment from entering. Your own RMP supports the above management action and highlights the uniqueness of the area.

Land Acquisition

7 **Page 17:** Most of the areas identified are uplands away from the Colorado River. I suggest more effort be put into recapturing and obtaining other lands that are in the alluvial floodplain along the Colorado River. This would insure protection of these important riparian lands for wildlife and if they are in poor condition, they can always be improved. Acquisition and protection of riparian habitats should be featured by BLM.

Agricultural Permits and Leases

Page 17: Acreages under special agricultural loses without attached water rights should be canceled once the Central Arizona Project comes

Wood Collection

11 **Page 21:** Again, the idea is good but the enforcement is not there. Collection of wood for campfires or any other uses should be denied and enforced in riparian habitats.

Wilderness

Pages 21-23: The absence of some unique and valuable wilderness areas leaves me wondering what is going on in the District. For example, all of Cactus Plain, East Cactus Plain, South Trigo, the Trigo Mountains, and Muggins Mountains all qualify for wilderness inclusion (see WSA descriptions). Yet, the are not included in this section and should be in the final.

11

Box 6235
Salt Lake City, Utah 84106

February 25, 1985

Planning Team Leader
Yuma District R.M.P.
Bureau of Land Management
Yuma, Ariz.

Dear Sirs:

I am disturbed by the lack of genuine "resource protection" in your draft Yuma District R.M.P.

By your own admission, your district has no major mining production, no oil & gas and minor livestock grazing. Yet your district does have major recreational use, in fact, perhaps one of the most recreationally used BLM districts in the entire West.

1 One of the stated goals of your R.M.P. is to "provide for the enhancement of the visitors' recreation experience" (p.7). In view of the major recreational use of your district, I would submit that this above goal should be the dominate goal in your district. My criticism is that you do not appear to appreciate the role that wilderness areas and special management areas for natural features and cultural resources would play in "the enhancement of the visitors' recreation experience." I feel this holds true even for your river-related users, ORVers and long-term campers.

Is not a natural, rugged and "frontier atmosphere" entirely in keeping with the expectations of your district's visitors? You surely agree that additional roading scars, more power lines and herds of cattle would detract from the natural values of your district?

I feel that even boaters, water skiers, fishermen, ORVers and the seasonal long-term campers all appreciate the "natural atmosphere" of your district as much as hikers, backpacker-campers, wilderness seekers, naturalists and scientists do. Thus, I am truly disturbed by your apparent disregard of wilderness and natural areas. Truly disturbed.

WILDERNESS: Your Preferred Alternative recommends only 54,000 acres for wilderness. This is only 25% of your identified WSA-acreage, which is a mere 4% of the BLM land in your fine district. Even your "Balanced Production" and "Balanced Protection" alternatives indicate more wilderness! Is this a preferred bias for production (?!) in your recreation-oriented district???

What's wrong with a lot of wilderness areas in your fine district? Let's keep it as natural as possible for your major users, the recreational visitors.

- 2 -

Even all WSA's for wilderness amount to only 220,000 acres, or only 17% of the BLM lands in the district. If you are concerned about legitimate "manageability" of wilderness, your "Balanced Protection" alternative still acknowledges that 144,000 acres could be wilderness, which--again--is but 11% of the BLM land in your district.

Your "preferred" recommendations for wilderness in your beautifully wild & natural district are grossly lacking in long-term outlook for all your greatly to-be-increased visitors and recreationalists. Instead, consider maximizing wilderness in your district. After all, "maximum" involves only 17% of your area as possible permanently-protected wild & natural areas.

2 NATURAL AREAS: Again, your Preferred Alternative recommends only two (only two?!?) areas for "Special Management." Your so-called district office's intention to manage many special areas for "wildlife habitat priority" is not good enough. Many, if not all, of the areas identified will need actual "Special Management" designation, if not wilderness designation to keep them protected for the long-term.

Again, even your "Balanced Protection" alternative identifies many, many more areas for special management than your preferred alternative.

Why this apparent lack of concern for genuine protection in your district? Your district is not a major or critical commodity producer! Your district's obvious major use is recreational! Your draft R.M.P.'s lack of actual "Special Management" identifications for your district's most remarkable areas is, indeed, disturbing.

Why not protect the scenic backdrop to Lake Havasu City; protect your desert's interesting plants and wildlife; protect the Indian sites, saguaros and scientific values of the Whipple Mts.; protect the unique formations of the Mesa; protect the "most outstanding recreational opportunities" in the Gibraltar Mts.; protect the proposed Nat'l Natural Landmark features of Banded Canyon; protect clearly against grazing the "untouched vegetation communites" of the Cactus Plain; protect your district's part of "one of the largest remaining undisturbed Sonoran Desert examples" in the Milpitas Wash; protect the extensive riparian habitat of Laguna-Martinez; and protect the really rather-tiny only remaining undisturbed section of the Yuma Desert in your "Yuma Desert" area? Why not? I ask as forcefully as I can-- WHY NOT?????

Clearly, your draft R.M.P. is seriously lacking in genuine protection for the natural values of your fine district.

A look at your district's map even with all WSA's as wilderness and all identified Special Managment Areas as actually specially managed areas indictes that your district would hardly be "locked

- 3 -

up." On the contrary, your draft R.M.P. is so lacking in genuine concern for "resource protection" that I am led to question the quality of your original inventory for potential wilderness study areas (WSA's) and for areas qualifying for deserved special management (which include Outstanding Natural Areas, Research Natural Areas and Areas of Critical Environmental Concern). How much more of "high natural value" might there be in your district?

Natural values certainly did not receive the consideration they received in the C.D.C.A. from that area's special Desert Planning Staff (unfortunately disbanded by dear James Watt), neither in your draft recommendations and nor (probably) in your original inventory of values.

That this is the case in commodity (regardless of how significant)-oriented districts of BLM is somewhat understandable, but for this to be the case in your fine "nature & outdoor recreation"-oriented district is unacceptable.

Yours most alarmed,

Elliott Bernshaw
a seasonal visitor

P.S.: copies of letter to Arizona BLM Director, Congressmen Mo Udall and John Seiberling, and newspapers in Yuma, Lake Havasu City (including Chamber of Commerce), Tucson and Phoenix. I swear I would do more if I could.

12

Planning Team Leader Draft RMP/EIS
BLM Yuma District
P.O.Box 5680
Yuma AZ 85364-0697

27.02.85.

Dear Sir,

I support Alternative "B"

Comments on BLM's Preferred Alternative:

What your Planning Team is proposing as the Preferred Alternative, is an uniquely fundamentalistic and hostile plan against ORV recreation within the Yuma BLM District. To propose of the total of 1.2 million acres ame token 640 acres for open intensive use and zero acres for ORV open category! No other BLM District has issued such restrictive plan against open ORV recreation.

1 Your Draft on p. 93 identifies as high ORV use areas currently as 15 120 acres and also your report states the ORV use is on the increase. And yet, you plan to compress all open type ORV activities into a mere 640 acres. While this small patch of land is classified as single use ORV, a whopping 51,510 acres (54,750 acres with planned acquisition) are classified to the opposite end of single use spectrum namely wilderness! This is the most unbalanced BLM Preferred Alternative in existance in whole of U.S. .

Even your representation of figures is deceptively arranged. As an example table 2-7 under Preferred Alternative it shows that this Alternative will result as 22,420 acres will be closed to ORV. Your foot note states that the acreage of the proposed wilderness are not included even that you propose these under your Preferred Altern. as wilderness areas and consequently will be closed with the congressional approval. You prefer such closure, it will come about if your preferred alternative is adopted therefore the true closed area to ORV under the Preferred Alternative when implemented will be not 22,420 acres but 76,650 acres with the proposed acquisitions. No other BLM District so far has used this type of misleading calculations in their acreage tabulations for the various proposed alternatives.

I hope if your severely restrictive Preferred Alternative is enforceable without a large police force. As a historical precedent I suggest you study the infamous "Battle of the Bulldozers" which took place when BLM Moab District declared a high ORV use area closed (Negro Bill Canyon area). BLM lost that battle. It had to reclassify and reopen the area after the confrontation took place because the BLM did not give adequate importance to the historically existing high use frequency

and the present and future demand for such type of recreation. Is the BLM Yuma Planning Team inviting a similar unfortunate confrontation by allocating only 640 acres for open intensive and open type ORV recreation?

Reading the Draft RMP/EIS Preferred Alternative it strikes me that as if an attempt is made to turn the Yuma BLM District into a National Park. It does not come as a surprise that the Team Leader and several key team members are transplants from the National Park Service.

I respectfully request that this letter be published and commented upon in the Final Yuma District RMP/EIS.

Sincerely,

Harry Welt

Harry Welt
P.O.Box 54
Fortkill, ID 83853

cc AMA, Land Use Coordinator, Government Relations

Letters Received That Were Similar To Letter No. 13

A total of 58 letters were received expressing opinions and concerns similar to those stated in letter number 13. Since these comments do not present new data or dispute either the facts or the outcome of the environmental analysis, they are not reproduced here. Following is a list of index numbers assigned to these letters. Table 6-2 matches these numbers with the letter writers' names.

14	33	49	82
15	35	50	83
16	36	51	94
17	37	56	98
19	38	57	105
21	39	58	108
22	40	59	149
23	41	60	172
24	42	61	178
27	43	62	193
28	44	66	233
29	45	67	273
30	46	75	277
31	47	76	
32	48	77	

13

28 FEB 85

DEAR SIR,
WE ARE WINTER VISITORS TO THE YUMA AREA UTILIZING THE BLM LAND. WE ENJOY THE AREA ESPECIALLY AROUND THE GENERALS WASH. WE THINK YOU ARE DOING AN EXCELLENT JOB IN PLANNING & MAINTAINING THE AREA. PLEASE LEAVE THE BLM LAND IN THIS AREA "AS IS" AND LET US ENJOY THIS AREA.

Sincerely
Norm & Flo Pegues

NORMAN & FLO PEGUES
5600 SPRING CREEK DR
GUNTERSVILLE, ALA 35976

18

Feb. 28, 1985

J. Darwin Snell
District Manager
Bureau of Land Management
Yuma District Office
P.O. Box 5680, Yuma, Az. 85364

Dear Mr. Snell;

I am a permanent Tax paying resident of Quartzsite, La Paz County Arizona as were my Parents for 50 years before me.

I am writing this letter to express my views as regards the activities and plan of Management that is now ongoing in your district

First let me say that Myself and my Parents before me have been involved with Mining on Land Managed by your office as well as the Phoenix Office for a lifetime of years.

During this time the B.L.M. always operated within the concept of Multiple use of the Public Lands. I have seen the following uses of the land over the past years, Cattle grazing, Rock Hounding, Hunting, Prospecting, picnicking, Fishing, hiking and pleasure driving, last but not least Mining.

In regard to the so called Wilderness Classification sought by certain special interest groups on certain Areas I must say this.

Your ongoing plan shows good judgement for the most part within your guidelines as mandated by Congress under the 1976 FLPMA Act, and in this respect you have done a good job as usual.

Next page please

Page 2

However, this part of Arizona in your district is by its very character over a large portion already what may be termed remote, inhospitable, waterless and contains many areas of a nature that although near a road of some kind certainly offer solitude and primitive recreation if that is desired. Most of the use of the more inaccessible areas is to my knowledge by hunters, prospectors, geologists, rockhounds and cattlemen, and this to a limited degree. I have never seen a backpacker or person seeking solitude in these areas probably due to lack of water, heat, and the real danger of everlasting solitude if you don't understand the desert.

I agree that some so called Wilderness Areas are desireable and we have these areas now, Our National Parks System is such an example, Alaska is an example, Millions of acres are available to persons that wish to seek primitive recreation where such activity would be more enjoyable, have water (all important) and less dangers in many states including Arizona.

I cannot agree to any other use of the Public Lands except properly managed multiple use and up until the vocal, emotional, self serving clamor of the special interest groups was heard in Washington the Bureau of Land Management did an excellent job.

I will appreciate notification of any changes in your resource management plan as now drafted.

If I can be of any help please let me know.

Sincerely yours,
Dan Patel

P.S. You may copy this letter and send copies to whomever you wish.
D.P.

-2-

The Snowbird Messenger is great & appreciated, but it does not begin to reach the majority of RV'ers coming & going. Every BLM employee should be able to, in a friendly way of course, advise offenders & repeat offenders should be fined. (as in U.S.F.S.)

Another dump station is needed and more areas opened along the Colorado for the ever expanding RVs — and demands for more land to be used for RVs all very apparent.

Sincerely
Mrs. D. P. Crepe
P.O. Box 744
Bard, Calif 92222

20

Feb 28-1985

Planning Team Leader
BLM Yuma District Office
P.O. Box 5680
Yuma Az

Sir—

Would like to make a few suggestions regarding land use.

First I feel the 14-day limit area should be eliminated entirely. With more and more RVs crowding into the designated areas each year the 14-day area could be much more effectively used. There is just no way this limit can be enforced in a fair way. Just HOW could a 25 mile move be verified and enforced??

Secondly is the enforcement of the rules & regulations! BLM has asked (in the Snowbird Messenger) that rigs park at least 15-20 feet apart for safety reasons — Yet they are parking 2-5 ft apart and nothing is said to them. Dogs are supposed to be leashed — yet they continue to run loose. I believe they signs, with Rules & Regulations be posted in the various areas so all are aware.

26

Yuma District Office
PO Box 5680
Yuma Ariz. 85364-0697

Mr. & Mrs. John Simpson
3001 Sheridan Drive
Lake Havasu City, AZ 86403

Re: BLM's draft management Plan
Mohave County - Cameron Peak Area.

Dear Sirs:

Our Mohave County Desert is a harsh land with very little rainfall. In the past, Spanish people depleted the Saguaro Barrel cactus, century plants, and even smaller, the ironwoods were taken for charcoal cooking.

Now I walk for 2 & 4 hours and find two or three protected areas with the elements still intact and beautiful as a desert can be. This area is fragile and will not stand up to heavy traffic, wheels and people with cars, so to speak.

I recommend the area be maintained as a Wilderness area. Wheels on roads only. No miners with guns telling me that I can't walk over that mountain. Let's try for a little more grandeur of space and maintain some lovely open sky. This space in Mohave County can be improved with very little care. So why not?

Very Sincerely,
John M. Simpson

34

JACK DEVAULT
Box 1498
Wickenburg, AZ 85358
March 15, 1985

Telephone: 684-5514

Planning Team Leader
Yuma District - BLM
Box 5680
Yuma, Arizona 85364-0697

Subject: Yuma District RMP/EIS

Dear Sir:

I commend the BLM Team on suggesting some areas are unsuitable for Wilderness designation.

In fact, all the Yuma District is unsuitable for Wilderness. The public (us tax payers and even the free-loaders) are better served to have multiple-use land where even the handicapped can drive to remote areas and enjoy the solitude. I'm not handicapped but like others prefer to drive to the areas of choice--not hike in.

I respectfully request that all the areas be returned to multiple use.

Very truly yours,

Jack Devault

Jack Devault
Tax Payer

P.S. In all my years in Arizona I have never seen nor met a hiker in the desert off the road.

52

TOWN OF PARKER

1314 11TH STREET • P.O. BOX 609 • PARKER, ARIZONA 85344 • (602) 669-9265

RECEIVED MAR 9 1985 Yuma District Office BLM

March 5, 1985

Darwin Snell
District Manager
Bureau of Land Management
Post Office Box 5680
Yuma, Arizona 85364
Dear Mr. Snell:

The Parker Common Council has reviewed the Yuma District Resource Management Plan and Environmental Impact Statement Draft, attended several of the public hearings pertaining to the Study and wish to voice their objections to the proposed changes.

This letter is intended to be a formal protest to Issue 5: Rights-of-Way (Utility Corridors) and Issue 7: Wilderness (Wilderness Study Areas Cactus Plain) as they pertain to the Town of Parker.

It appears the preferred alternative of the six alternatives presented is the one most likely to be recommended for adoption by the Bureau of Land Management. While this is the better of the alternatives presented, it will never the less have a significant impact upon the Town and its future growth.

The Town of Parker, Arizona was incorporated as a township in June 1948. It encompasses one (1) square mile, is surrounded on three (3) sides by the Colorado River Indian Tribes Reservation and the Colorado River on the forth side. Thus growth, economic development and annexation of contiguous land was not possible.

1 Studies made by the University of Arizona, Tucson in 1978 and 1980 revealed those sections of land located in Township 8 North, Range 19 West of the Gila and Salt River Base and Meridian, La Paz County, Arizona were the most feasible lands to annex due to the proximity of the Town. Annexation proceedings were instituted in 1981 pursuant to Arizona Revised Statutes 9-471(I). The annexation was approved by the State of Arizona April 9, 1984.

The Town has to date expended more than $95,000.00 to expedite the steps necessary to allow them to proceed with this project.

Objections to Issue 5: Rights-of-Way (Utility Corridors) the preferred alternative of the Resource Management Plan calls for a one (1) mile utility corridor in the area identified as 5-14A/B Cactus Plain that would cut through the center of the Town (UC-6). UC-6B alternative

Letters Received That Were Similar To Letter No. 34

Forty-one letters were received expressing opinions similar to those stated in letter number 34 above. Of these, 11 expressed support for multiple use on all public lands; six expressed opposition to wilderness in general; and 24 expressed opposition to wilderness and support for multiple use. Since these letters did not present new data or dispute either the facts or the outcome of the environmental analysis, they are not reproduced here. Following is a list of index numbers assigned to these letters. Table 6-2 identifies the letter writers.

69	86	176	296
70	87	234	298
71	88	236	300
72	89	241	301
73	90	244	302
74	93	275	318
78	97	280	342
79	99	281	344
80	100	282	
84	109	284	
85	155	285	

Page 2
March 5, 1985

1 would take a one (1) mile strip of land from the eastern boundary of the Town limits running from the northern most to the southern most edge of the Town. If the proposed utility corridor UC-6B was moved one (1) mile to the east, it would be out of the Town limits. A more appropriate corridor would be one that parallels the Central Arizona Project.

Objection to Issue 7: Special Management and Wilderness Study Areas, the alternatives as defined would place approximately one half of the Town into the Special Management/Wilderness Study Area. This would severely hamper any projected growth or development for the Town. A better alternative would be to stop the Special Management/Wilderness Study Areas at the eastern boundary lines of the Town.

We request you send a letter to the Bureau of Land Management voicing your objection to the Yuma District Resource Management Plan and Environmental Impact Statement and the alternatives as outlined. We would also appreciate a copy of your letter to be included in our files.

Sincerely,

Samuel E. Davis
Mayor

Lloyd Gorrell
Vice Mayor

Lambert Haynes
Councilman

Roberta Hoffman
Councilperson

LaVell McIntire
Councilman

Frank Solper
Councilman

PROCLAMATION OF THE TOWN OF PARKER

Recitals:

1. That the Town of Parker was established in 1908 and incorporated in 1948 as a Town in accordance with the laws of the State of Arizona.

2. That the Town of Parker annex certain lands in LaPaz County and that the office of the Attorney General of the State of Arizona supplied the Town on April 9, 1984 with certification of annexation. A copy of that certificate and the supporting documents including the ordinance No. 179 of the Town of Parker and a map of the area involved is attached hereto and incorporated by reference in its entirety.

3. That the Unites States Department of Interior, Bureau of Land Management, Yuma District, has prepared a draft resource management plan and environmental impact statement (RMP-EIS) for future management options for approximately 1,192,000 acres of federal lands administered by the Bureau of Land Management through its Yuma District Office, Yuma, Arizona. That the plan focuses on resolving seven resource management issues:

Wildlife Habitat, Special Management Areas, Grazing, Land Ownership Adjustment, Rights-of-way, Recreation, and Wilderness.

4. That map No.8 of the maps supporting said plan and impact statement sets forth utility corridors of up to a mile in width. That UC-6 and UC-6B, are utility corridors which run through the heart of the area annexed by the Town of Parker.

5. That the presence of a utility corridor up to a mile in width in either UC-6 or UC-6B would cause irreparable damage to the Town in its development of the annexed area.

6. That the Town of Parker has expended since April, 1978, in excess of $95,000.00 in development of said townsite and has committed itself for a substantial additional sum incident to further developing said area.

7. That the Town of Parker respectfully requests that the said utility corridor be placed to the east outside of said corporate limits of said Town.

8. That the Town of Parker wholeheartedly endorses the Score 400 off-road race over BLM lands and the existing course site since the Town is a benefactor as is the area in general to the economic benefits generated by said race.

1

53

March 4, 1985

Richard Pruett
5428 W. Altadena
Glendale, Arizona 85304

J. Darwin Snell
BLM, Yuma District
P. O. Box 5680
Yuma, Arizona 85364-0697

Dear Mr. Snell:

I have been informed that the BLM is in the process of developing a Resource Management Plan and an Environmental Impact Statement for the Yuma, Arizona Desert District on the understanding that the recreation plan seems to be a little short on acreage and is turning alot of the camping and recreational areas into wild life priority areas. I have keen interest in this recreational area inasmuch as my family is avid campers with our motor home and recreational users with 3-wheel ATC's.

What I am asking from you is an opportunity to review the Draft Plan and the EIS. From what I understand, Alternate B Plan is an expanded off-highway vehicle plan which I would endorse. If you could send me whatever information you have on this plan, I would certainly appreciate it.

Kindest Personal Regards,

Dick Pruett

Therefore, the Town of Parker upon motion duly made and passed at a regularly scheduled Council Meeting of the Common Council of the Town of Parker, states as follows:

1. That the draft resource management plan and environmental impact statement take into account the presence of the area annexed by the Town.

2. That the plan be revised in such a way as to circumvent the Town.

3. That the Town go on formal record with the United States Department of Interior, Bureau of Land Management as wholeheartedly endorsing the Score 400 off-road race over BLM lands and existing course site since the Town is a benefactor as is the area in general, as to the economic benefits generated by said race.

4. That copies of this Proclamation be sent by the Town Manager to those officials who might have some input with regard to helping the Town grow and prosper and that they be encouraged as well as all others interested, to make comments on the draft resource management plan and environmental impact statement as requested in said plan and that comments be made in a timely fashion, namely on or before April 19, 1985.

Dated this 5th day of March, 1985.

Sam Davis, Mayor

2

54

PACIFIC GAS AND ELECTRIC COMPANY

77 BEALE STREET • SAN FRANCISCO, CALIFORNIA 94106 • (415) 781-4211 • TWX 910-372-6587

March 6, 1985

BLM Yuma District Resource Management
Plan, Re: Rocky Mountain Pipeline GD1588
025.35 BLM 1143

Mr. Dennis Turowski
Bureau of Land Management
Yuma District Office
Post Office Box 5680
Yuma, Arizona 85364-0697

Dear Mr. Turowski:

Thank you for giving Pacific Gas and Electric Company the opportunity to review the latest draft of the Yuma District Resource Management Plan (RMP). As stated in our previous correspondence, PGandE's interest in the RMP is to protect a corridor for the proposed Rocky Mountain Pipeline Project. To this end, PGandE supports the "Preferred" alternative as well as alternatives "C", "D", and "E". These alternatives allow the use of the utility corridor designated "California Desert Conservation Area-F" for the proposed pipeline.

1 We do wish, however, to call your attention to a confusing reference on page 36 of the RMP under the heading "Issue 5: Utility Corridors 2)." The road referred to as forming the eastern corridor boundary along the Fort Mohave Indian Reservation is unknown to us. Likewise, none of the maps supplied with the RMP indicate a road which could logically form the corridor boundary. It seems, therefore, that the road reference is in error and we suggest the following wording be substituted:

2) The CDCA "F" corridor would be narrowed for 5 miles to a 100-foot width west of the boundary of the Fort Mohave Indian Reservation.

The Rocky Mountain Pipeline Project is currently on hold, however, it is expected to be reactivated once gas supplies and market conditions support the need.

Sincerely,

E. L. Nurisso
Supervising Land Planner

ELN:lt

55

DEPARTMENT OF THE AIR FORCE
REGIONAL CIVIL ENGINEER, WESTERN REGION (AFESC)
630 SANSOME STREET - ROOM 1310
SAN FRANCISCO, CALIFORNIA 94111-2278

MAR 08 1985

REPLY TO ATTN OF: ROV (Lammi/556-6439)

SUBJECT: Yuma District Resource Management Plan and Environmental Impact Statement

TO: Mr. J. Darwin Snell, District Manager
Bureau of Land Management
Yuma District Office
P. O. Box 5680
Yuma, Arizona 85364-0697

1. We have reviewed the subject RMP and final EIS and have no objections to your proposal provided that no restrictions are placed by your agency on our existing military overflights.

2. As you are aware, the Yuma District Planning Area has historically been subject to military overflights, which should continue in the future. In the past, there have been no major problems between the Air Force and the Bureau of Land Management concerning military overflights regarding lands under your management.

3. Thank you for including the Air Force in your consultation and coordination phase. We find it advisable to note that the Air Force makes extensive use of this area for Military Training Routes. A map of the Department of Defense Military Training Routes - Western US, Area Planning AP/1B Chart dated 14 February 1985, is included for your information.

4. We consider your proposed plan and Military Operating Areas R-2501N, R-2501E, R-2501S, R-2501W, R-2507N, R-2507S, R-2306, R-2306B, R-2306A, R-2308A, R-2308, and R-2307 to be a compatible use of these resource areas. We hope you will agree with us and contact our office should you have any questions.

5. For future reference and more expeditious response by our agency, documents of this nature should be routed directly to this regional office of the U. S. Air Force. One of our responsibilities is to act as the single point of contact for agencies in Federal Regions IX and X, and for State agencies in regard to a variety of necessary organizations within the Air Force which could potentially be affected by the actions or proposals of other Federal and State agencies. Likewise, any questions or concerns you might have regarding Air Force activities and their potential impact on lands under your jurisdiction, can be directed to this office.

6. We appreciate your past efforts to include the Air Force in the review and comment coordination of environmental documents and management plans. Our natural resource project officer, Mr. William Cox, can address any questions or concerns. He can be contacted at (415) 556-6439 or FTS 556-6439.

Phillip E. Lammi
PHILLIP E. LAMMI, Chief
Environmental Planning Division

1 Atch
AP/1B Chart

63

STATE OF CALIFORNIA — GEORGE DEUKMEJIAN, Governor

NATIVE AMERICAN HERITAGE COMMISSION
915 Capitol Mall, Room 288
Sacramento, California 95814

(916) 322-7791

March 11, 1985

Planning Team Leader
U.S. Department of the Interior
Bureau of Land Management
Yuma District Office
Post Office Box 5680
Yuma, Arizona 85364-0697

RE: Yuma District Resource Management Plan EIS

Dear Planning Team Leader:

The California Native American Heritage Commission appreciates the opportunity to express its concerns and comments in the environmental review process. As you may be aware, the Commission is mandated to preserve and protect Native American cultural resources pursuant to Section 5097 et seq. of the Public Resources Code.

The Commission has the further responsibility of assisting Native Americans in cemetery and burial protection pursuant to Section 5097.94(k) of the Public Resources Code. Should human remains of Native American origin be encountered, we request that the County Coroner's Office be contacted pursuant to the procedures set forth in Section 5070.5 of the Health and Safety Code.

Having reviewed the EIS for this management plan, I appreciate your solicitation of comments from the Native Americans in or adjacent to the project area, and feel confident that their comments and concerns will be duly considered in preparation of the final EIS.

Should Native American cultural resource issues arise, please do not hesitate to contact me or my staff.

Thank you again, for soliciting our input.

Sincerely,

John D. Smith
Executive Assistant

JS:bg

64

LWS 3-10-85

Comments to Yuma District RMP/EIS DRAFT

Threatened, Endangered and Rare Species

1	Page v	Table of Contents Appendix E; Recommend use of Threatendd, Endangered and Rare if that is what is meant. RMP/EIS refers to key, listed, T&E, priority wildlife. However is it always referring to the same set of protected wildlife under state or Federal statute?
2	xv	T&E SPECIES entry is considered incomplete. The status shown in Table 4-11, App. E includes other species of same level of protection under Federal statute, but no reference is shown.
3	13-15 App. B	Table 2-1 Proposed Special Management Areas and paragraph under ISSUE 2: SMA are not consistent and difficult to understand for Preferred Alternative if compared to App. B Environmental Consequences. For instance p. 221 Whipple Mountain AZ 5-10 "managed for protection of scenic values", yet Table 2-1 shows "NO*" with Area of Critical Environmental Concern. Aubrey Hills
4		and Whipple Mountain contain excellent Yuma Clapper Rail habitat. Gibraltar Mountain per Table 4-1 has Federally listed endangered species. Laguana-Martinez, an ACEC shows "NO" in Table 2-1 but shows priority wildlife under Riparian AReas, p. 13.
5	35, 72	Alternative D Bighorn Sheep use areas - These threatened species have no mitigation or protection in any alternative through the "second migration" route described on p. 72 Dome Rock where I-10, two-five strand barbed wire fence form an impassable (?) barrier. Recommend a survey (by Yuma Audubon, if requested) to establish acceptable crossing venues, ingress and egress techniques. Review could by by Arizona Game & Fish and/or US Fish and Wildlife..
6	38,41	Table 2-12 Alternate D is mislabeled, it should be Balanced Protection.
7	89 247,248	Table 4-11 and App. E present TER species under various government statutes. The classifications vary due to habitat and species preference for various jurisdictions. The discussion on p. 89 From Wilderness is one-sided. The negative impact on these TER species should be presented. Significantly, about three-fifths of the WSA - Alternative combinations remove WSA status for habitats shown to include TER species. The desert tortoise was the subject of a question during the April 1984 BLM coordination meeting held at the Yuma Convention Center. Awritten reply was promised and received, since no oral reply was available when the question was posed. The written communication was that BLM does respect state protection for the desert tortoise. Therefore, if the RMP has a preferred alternative it would follow that those WSA's containing desert tortoises would receive as a minimum priority wildlife status. That includes 17 WSA's. Yet Table 4-11 shows 5-14A/B and 5-4 as the preferred alternative: two WSA'S. Why is this done?
	89 223,222	Gibraltar Mountain 5-12 contains Federally endangered species: Peregine Falcon and Bald Eagle. The discussion of impacts

TER Species, Page Two

Page 222, 223

8 under the Preferred Alternative, where 5-12 is omitted should consider the negative impact of loss of protection tothese Federally listed species, cf. p. 201. It is not clear how much of the 26,080 of special management pertain to 5-12. Given high mineral content in 5-12 and the ensuing BLM preference, does not mean to ignore Federally designated species. This environmental impact appears to have been omitted and should be redressed.

139, 140

9 Irreversible and irretrievable: Webster's New World Dictionary, 1970 Irreversible'cannot be a) repealled b) run backward', irretrievable 'cannot be recovered, restored.' Could less confusing, similar, dual possible meaning words be used? It seems so... Table 4-31 under Wildlife refers to areas 3 and 9. Are these found in Table 2-8? Does the NO under Irretrievable mean that the habitat and migration can be recovered/resumed?

10

11

Dr. Lothar M. Schmidt
Engineering Consultant
Automatic Test Systems

DIGITAL SYSTEM DESIGN/ARIZONA
12175 South Pontwood Drive • P.O. Box 983 •
Yuma, AZ 85364 • (602) 344-3259

68

BOB STUMP
3D DISTRICT, ARIZONA

211 CANNON BUILDING
WASHINGTON, D.C. 20515
(202) 225-4576

DISTRICT OFFICE:
5001 FEDERAL BUILDING
PHOENIX, ARIZONA 85025
(602) 261-6613

ARMED SERVICES COMMITTEE

PERMANENT SELECT COMMITTEE ON INTELLIGENCE

VETERANS' AFFAIRS COMMITTEE

Congress of the United States
House of Representatives
Washington, D.C. 20515

March 12, 1985

Mr. Darwin Snell
District Manager
Yuma BLM District
P.O. Box 5680
Yuma, AZ 85364-0697

Dear Darwin:

Enclosed please find a letter from the Parker Common Council concerning the Yuma District Resource Management Plan.

1 Would appreciate your including the Town's letter with the public comments, as well as your reviewing their concerns and suggesting a course which could be taken to mitigate the impact on the Town.

Thank you for taking the time to brief my staff last week, and keeping me advised of your progress on this matter.

Sincerely,

BOB STUMP
Member of Congress

BS:ll

65

Laurence William Van Dusen

3/11/85

Allan Belt
Bureau of Land Management
Yuma District Office
P.O. Box 5680
Yuma, Az. 85364

Gentlemen:

Yuma, Arizona is the Oldest and Largest Arizona City on the Colorado River.

About 10 Million Acre Feet of water went down the Colorado last year right thru Yuma's Front Door.

And yet, you can't even rent a row boat in Yuma!

1 Can the Bureau of Land Management assist the City of Yuma in developing water recreational facilities on the Colorado at Yuma??

Sincerely,

Larry Van Dusen

Larry Van Dusen
P.O. Box 1588
Yuma, Az. 85364

LWVD:ss
enc.

TOWN OF PARKER
1314 8TH STREET • P.O. BOX 609 • PARKER, ARIZONA 85344 • (602) 669-9265

March 5, 1985

Congressman Bob Stump
230 N. 1st Avenue, Room 5001
Phoenix, Arizona 85025

Dear Congressman Stump:

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March 5, 1985

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Mayor

Lloyd Gorrell
Vice Mayor

Lambert Haynes
Councilman

Roberta Hoffman
Councilperson

LaVell McIntire
Councilman

Frank Solper
Councilman

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Wildlife Habitat, Special Management Areas, Grazing, Land Ownership Adjustment, Rights-of-way, Recreation, and Wilderness.

4. That map No.8 of the maps supporting said plan and impact statement sets forth utility corridors of up to a mile in width. That UC-6 and UC-6B, are utility corridors which run through the heart of the area annexed by the Town of Parker.

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8. That the Town of Parker wholeheartedly endorses the Score 400 off-road race over BLM lands and the existing course site since the Town is a benefactor as is the area in general to the economic benefits generated by said race.

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Dated this 5th day of March, 1985.

Sam Davis, Mayor

2

81

Roland J Chelfour
P.O. Box 20354
Wickenburg AZ 85358

March 12 1985

Planning Team Leader.
Yuma District Office -
P.O. Box 5680
Yuma AZ 85364-0697

Hello

We would like to see more land into Multi use, I think it will benefit us all more. Without excluding the Miners and others, Some land in Wilderness is ok for the Wild Animals

Thank you.

Sincerely

Roland Chelfour

91

Arizona
Bureau of Geology and Mineral Technology
Geological Survey Branch
845 N. Park Ave., Tucson, Arizona 8571
(602) 621-7906

B.L.M. RECEIVED
MAR 20 1985
Yuma District Office
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YUMA, ARIZONA
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YRA
HRA
ACTION BY

March 15, 1985

Planning Team Leader
Yuma District Planning Area
Bureau of Land Management
Yuma District Office
P. O. Box 5680
Yuma, AZ 85364-0697

Dear Planning Team Leader:

We have reviewed the Yuma District Resource Management Plan and Environmental Impact Statement and have given special attention to the description of the geologic framework, to the description of known mineral resource occurrences and production, and to the assessment of mineral and energy resource potential.

We concur with the assignment of high mineral resource potential in the Crossman Peak, Swansea, S. Trigo, and Trigo areas, as described in the report.

With regard to the Kofa Units 3 and 4, the author states that not much geologic information is available. The U. S. Geological Survey is currently assessing mineral resource potential in the KNWR and will submit a final report by April 1986. Perhaps any assessment of mineral potential at this time may be premature.

We believe that, overall, the geologic information contained in the GEM reports is accurate. However, we believe that the geologic structure in the Cactus Plain East is not adequately stated and, in turn, the mineral potential is understated. The Mineral Hill, Pride, Planet, Copper Penny, and Swansea mines are located a short distance to the north and east of the Cactus Plain East. Mineralization in these mines (gold and copper) is located in upper plate rocks near an extensive low-angle detachment fault. Because the fault almost certainly dips beneath the Cactus Plain East, upper plate rocks may be preserved and may be close enough to the surface in some or all of the area to give it potential as a mineral exploration target. It is entirely possible that mineralization may be present near the contact of upper and lower plate rocks beneath the Cactus Plain East. Assuming that possible buried mineral deposits are of comparable size as those at Planet, Swansea, Copper Penny, Pride, and Mineral Hill, it is unlikely that they would be economic if depth to bedrock is great (greater than 500 feet). A gravity survey would be most helpful in determining depth to bedrock and would greatly aid those who estimate resource potential. Gravity surveys are relatively inexpensive to conduct.

The same low-angle detachment fault probably extends beneath the Cactus Plain area as well. Depth to the fault beneath that area is unknown. One would suspect that the fault is at a greater depth there than beneath the Cactus Plain East. That interpretation would have to be substantiated by a gravity survey or by drilling, however.

A Division of the
University of Arizona

A description of the low-angle detachment fault can be found in the following article: Wilkins, J., Jr., and Heidrick, T. L., 1982, Base and precious metal mineralization related to low-angle tectonic features in the Whipple Mountains, California, and Buckskin Mountains, Arizona, in Frost, E. G., and Martin, D. L. (editors), Mesozoic-Cenozoic tectonic evolution of the Colorado River region, California, Arizona, and Nevada: Cordilleran Publishers, San Diego, p. 182-203.

Depth to bedrock is shown on a map by J. M. Oppenheimer and J. S. Sumner (Depth-to-bedrock map, Basin and Range Province, Arizona, 1980: Tucson, Laboratory of Geophysics, The University of Arizona, 1:1,000,000 scale) to be approximately 400 feet. The 400-foot contour line is dashed, however, indicating that interpretation is less certain. The map is based on a series of gravity profiles. The gravity and depth-to-bedrock values for each profile are on file at the Laboratory of Geophysics at the University of Arizona, Tucson.

Sincerely,

Larry D. Fellows
State Geologist and
Assistant Director

LDF:ms

92

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MAR 20 1985
Yuma District Office
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B.L.M. RECEIVED
MAR 20 1 5 PM '85
YUMA, ARIZONA
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Resources
Operations
YRA
HRA
ACTION BY

March 18, 1985

Mr. J. Darwin Snell, District Manager
Bureau of Land Management
Yuma District Office
P. O. Box 5680
Yuma, Arizona 85364

Dear Mr. Snell,

I am writing to recommend a reassessment of several areas either not included, or areas where more acreage should be added to the proposed recommendations for wilderness designation, as documented in the Yuma District Environmental Impact Statement.

1. Both Kofa 3 and 4 should be recommended for wilderness to include the portion of the Castle Dome Mountains not in the Kofa National Wildlife Refuge. The Castel Domes, the highest ranges in Southwest Arizona, is also one of the most scenic ranges, with its high sheer rock walls and majestic, massive pillars and blocks that can be seen for miles.

2. The Trigo Mountains (WSA 5-23A & 5-23B) are adjacent to units proposed for wilderness by the Imperial National Wildlife Refuge. Including them under the wilderness protection would provide a unique area containing some of the driest desert in the world and in contrast, the lusher riparian zone along the Colorado River.

3. I would like to have both Cactus Plains areas (WSQ 5-14A/B and WSA 5-17) included in the preferred alternative. The high natural quality of these areas is deserving for designation for wilderness, containing stabilized sand dunes on which a variety of desert vegetation grows. In contrast to wilderness areas whose core is a mountain, the Cactus Plains offers a feeling of solitude and quiet on their vast plains. Please propose all 70,360 acres of the Cactus Plains WSA and all 13,735 areas of the East Cactus Plain.

4. Please include the 19,370 acres of the Swansea area (WSA 5-15A) which contains a canyon, adjacent mountains and mesas along the Bill Williams River. This highly scenic area provides riparian habitat for wildlife and should be proposed for wilderness.

5. The Crossman Peak area contains much of the massive Mohave Mountains which form a scenic backdrop for Lake Havasu City. Designating this area for wilderness, including Crossman Peak at 5100 feet, would protect environmental, scenic, and recreation values. It would further diversify the recreational opportunities in the Lake Havasu City area.

6. Just 10 miles east of Parker is rugged volcanic Gibralter Mountain, a good place to get away from it all. Narrow canyons, rocky peaks, and ridges all provide a diversity of hiking experiences, while isolating a visitor from others in the area. This area provides important habitat for desert bit horn sheep. Wilderness status would protect this area from ORV use, such as the careless vehicles which lose their way on the Parker 400 race. The wilderness designation is well worth the acquisition of 6020 acres of mineral (subsurface) estate. This area could then be expanded to 10,460 acres. Please recommend this area.

I congratulate the Yuma District on the fine work they have done in the production of the Resource Management Plan and Environmental Impact Statement. It is thorough and well documented and the maps are particularly explicit and helpful. I hope you will take my recommendations into consideration when preparing your final recommendations.

Sincerely,

Bobbie Holaday

Bobbie Holaday

1413 East Dobbins Rd.
Phoenix, Arizona 85040

Phone Of.: 862-5688
Hm.: 268-1089

95

SCORE INTERNATIONAL
Championship Off-Road Racing
31356 VIA COLINAS, SUITE 111 • WESTLAKE VILLAGE, CA 91362 • (818) 889-9216

MAR 1985 RECEIVED Marvin R. A. BLM

March 18, 1985

Mr. Jim May
Bureau of Land Management
Havasu Resource Office
P. O. Box 685
Lake Havasu City, AZ 86403

Dear Jim:

Concerning the Yuma District Resource Management Plan, I appreciate the opportunity you gave myself along with the general public to comment on the draft. It is quite an extensive report, and one that I must admit for myself, was pretty hard to digest in total.

The bottom line is that I would like to make sure that the SCORE Parker 400 race course be designated within the plan and that the race course and adjacent areas do not be such that we could not get onto the race course for spectator pitting and safety reasons.

I think the stipulations that were put on this year's event were quite stringent. I believe that we can work out stipulations for future events that can be adhered to and satisfy all concerned, but we must start working on them now. Also, I would like to suggest that a stipulation for a minimum of a five year agreement (permit) for the races be listed in the Resource Management Plan. 1

Again, thank you for the opportunity to comment. I look forward to discussing these comments with you soon.

Sincerely,

SCORE INTERNATIONAL

Sal Fish
President

ks

To: Planning Team Leader, BLM
Fm: Fred Hubbell
March 18, 1985
Page 2

this study are not yet available; however, the general outline calls for colocation of users whenever possible. Mohawk Pass is in a very strategic position and is a natural site for colocation.

Sincerely,

Fred Hubbell
Route Development
Coordinator

FH/vb

96

MCI
Telecommunications
Corporation
101 Howard Street
3rd Floor
P.O. Box 7167
San Francisco, CA 94120
415 495-2720

MCI

March 18, 1985

Planning Team Leader
Bureau of Land Management
Yuma District
P. O. Box 5680
Yuma, Arizona 85364

Attention: Dennis Turowski

Re: Mohawk Pass, AZ
#3116 Oatman, AZ-Dominguez Hills, CA

Dear Mr. Turowski:

It was a pleasure meeting with you and your staff Wednesday, March 13, 1985. Mohawk Pass is part of a proposed MCI microwave system in and out of the southern Arizona, southern California area. This essential link in our system, as we have discovered, is in jeopardy of becoming a nondesignated comsite area. The Telegraph Pass area is presently serving the communications traffic into these same areas. This present system is incapable of providing the quality signal we desire. It is our hope we will be able to route through Mohawk Pass by constructing an adjacent tower to the one presently on site. MCI feels this site would have the least visual and environmentally intrusive impact to the area in general. 1

Having read through the minutes of your last hearing, I see Mountain Bell has the same concerns as MCI. With all of these carriers pushing for use of this site and wheres the site is already employed as a comsite, please reconsider the designation of Mohawk Pass in favor of establishing it as a communications site.

I am presently working with the Desert Advisory Council of California Task Force. We are dealing with establishing communications corridors through southern California. The conclusions of the data gathered for

(continued)

101

4231 E. STanford Dr.
Phoenix, AZ. 85018
March 20, 1985

Yuma District BLM
P. O. B. 5680
Yuma, AZ. 85364

Subject: Wilderness Designation Recommendation

Gentlemen:

If any two things epitomize Arizona, it is probably cacti and sand dunes, both of which exist in quantity in the Cactus Plain and Cactus Plain East. These areas deserve protection against developers, cacti rustlers and off-road vehicles.

Now that the military has released Muggins Mountains, it would seem appropriate to keep these peaks free from the ubiquitous off-road vehicle and the equally destructive miner. Let them rest in peace with a few climbers.

We must value the Swansea as a home: it shelters the desert tortoise, the Gila monster, the elf owl, and a few others. Surely wild life deserves a small castle of its own.

And, in conclusion, the Trigo Mountains & Trigo Mountains South offer all those with any desire for communing with either themselves or Nature the ultimate opportunity. Peace is hard to find and should be preserved.

I trust that you will agree with the validity of my observations and help to keep some acres for the future inhabitants of this country, both human and animal. Thank you.

Yours truly,

(Mrs.) Gene Anne Parker
(MRS.) GENE ANNE PARKER

Letters Received That Were Similar To Letter No. 101

Twenty-eight letters were received that were similar to letter number 101 in that they expressed support for designation of one or more of the 18 wilderness study areas addressed in the draft EIS. Since these letters did not present new data or dispute either the facts or the outcome of the environmental analysis, they are not reproduced here. Following is a list of index numbers assigned to these letters. Table 6-2 identifies the letter writers.

106	162	330
113	166	333
114	177	335
120	182	338
122	183	340
131	185	341
135	190	350
140	217	353
144	322	364
		369

Letters Received That Were Similar to Letter No. 102

An additional 82 letters were received expressing the same opinion as that stated in letter number 102 above. In total, 83 letters were received expressing support for designation of the 10 Arizona wilderness study areas in the draft RMP-EIS. Since these letters did not present new data or dispute either the facts or the outcome of the environmental analysis, they are not reproduced here. Following is a list of index numbers assigned to these letters. Table 6-2 identifies the letter writers.

107	129	159	198	336
110	130	160	206	337
111	132	161	267	345
112	133	163	310	347
115	134	164	315	348
116	137	165	319	344
117	138	167	321	351
118	139	168	323	356
119	142	170	324	357
121	145	171	325	358
123	147	175	327	359
124	148	179	328	362
125	150	186	329	363
126	151	189	331	365
127	152	191	332	367
128	158	194	334	368
				370

102

March 21, 1985

Yuma District BLM
P.O. Box 5000
Yuma, AZ 85364

The protection of wilderness can be our gift to future generations. I support wilderness recommendations for the following:

Trigo Mountains/Trigo Mountains South. These areas are adjacent to units proposed for wilderness in the Imperial National Wildlife Refuge and would include some of the driest desert in the world and also the lush riparian zone along the Colorado River.

Muggins Mountains. Yuma needs a wilderness close by which these rugged mountains would provide.

Cactus Plain/East Cactus Plain. This area was recognized by the Arizona Academy of Science, whose Natural Areas Study Committee recommended that parts of the Cactus Plain be designated a Natural Area. The Cactus Plain contains stabilized sand dunes on which a variety of desert vegetation grows. We urge you to keep off-road vehicles out of the WSA, and manage grazing to protect the unique vegetation.

Swansea. This area, along the Bill Williams River, has high scenic, riparian and wildlife values (Desert Tortoise, Elf Owl, Gila Monster, Bell's Vireo). All of this area should be proposed for wilderness. The WSA has no record of mineral production in over 120 years.

We hope you will also include Crossman Peak, Kofa 3 South, Kofa 4 North, and Gibraltar Mountain.

Thank you for your consideration in these matters.

Sincerely,

Janice C. Luepke

Janice C. Luepke
3401 E. River Road
Tucson, AZ 85718

103

Donald M. Currie,
Box 1093,
Bard, Ca. 92222
March 21, 1985

Team Planning Leader,
B.L.M.
Yuma District Office,
Box 5680,
Yuma, Az 85364

Gentlemen:

From the standpoint of a winter visitor I do believe that the recreation element, and the preferred alternative, answer most of our questions concerning our future visits to this area. We are always concerned that business interests in the trailer park field are constantly pressuring various levels of government to close down all camping on Federal and State lands. We have seen it happen in other areas and were concerned that it might happen here.

Your preferred alternative, which would allow you to expand the LTVA's as the need arose, is our assurance that there will be space available for us in the future. It would be nice if LTVA's could be developed in the Parker and Bullhead City areas.

Compliments are due to you and your group that put together the entire Resource Management Plan. With so many different areas to be covered in detail they did a first class job and seem to have covered all of them. Congratulations.

Sincerely,

Donald M. Currie

104

B.L.M. Office
Yuma, Ariz.

3-19-85

Dear Sir:

I have for many years roamed around in these mountains, enjoying the beauty of everything there, the wildlife, the gold mines & their history etc. It's simply beautiful. I like the Crossman Peak area.

Recently I attended your meeting at Lake Havasu City. I looked over the map and the Proposed New Boundry of the Crossman Peak area. I am not impressed with it in the least. I would suggest that this boundry be left just as it is. After all Mother nature made it this way and has protected it all these years with no restrictions, so every one could enjoy it. Let us leave it just as it is.

Thank you
Sincerely Yours
Harry Olivarius
Desert Hills Ariz.

Letters Received That Were Similar To Letter No. 136

Five letters were received that were similar to letter number 136 in that they expressed support for designation of all 18 wilderness study areas addressed in the draft EIS. Since these letters did not present new data or dispute either the facts or the outcome of the environmental analysis, they are not reproduced here. Following is a list of index numbers assigned to these letters. Table 6-2 identifies the letter writers.

141
184
314
339
360

136

FRED & ELLENOR SALINGER
6023 DE MEDICI DRIVE
SIERRA VISTA, ARIZONA 85635

Mar 23 '85

Yuma District BLM.
P.O. Box 5680
Yuma, AZ 85364

Yuma District Draft EIS

Hello:

Every action possible should be taken to preserve for future generations all of the wilderness areas covered in your EIS.

The "quality of life" is measured not only in material developments but how we preserve wildlife & wilderness areas.

These are irreplaceable - absolutely - once destroyed are never to be able to be replaced.

Consider these as "treasures" to be safeguarded for future generations rather than storehouses of materials to be exploited.

In particular as very sensitive ecological areas they should be treated & cared for - not ravaged.

Sincerely
F L Salinger P.E.

143

PETITION

Letter 143 was a handwritten petition bearing 137 signatures and the following statement. The statement has been typed verbatim by BLM for better reproduction and ease of reading in this EIS.

Planning Team Leader:

We are very much against any more wilderness or wildlife habitat as there is many miles of public land lost to all but a very small percent of the people. We maintain that multiple use of land gives the greatest benefit to the greatest number of people. We want the public land to remain as it is now.

146

WALTER'S CAMP, INC.

POST OFFICE BOX 31
PALO VERDE, CALIFORNIA 92266
(619) 854-3322

March 25, 1985

United States Dept. of Interior
Bureau of Land Management
P.O. Box 5680
Yuma, Arizona 85364

RMP Team Leader:

After numerous conversations with B.L.M., I feel a definite need to respond to a few matters that we face here at Walter's Camp.

Due to our particular circumstances and unusual situation due primarily to our location, some of the regulations found in the Interim Policy Statements are pretty hard core and unlivable. For instance, regarding Item #6 - length of stay at an R.V. Site; Maximum of five (5) months. I beleive that B.L.M. has revised a plan where people can buy a permit that allows them an eight (8) month stay anywhere on Public Lands for a fee of $25.00 per year.

As a Concessionair, we have spent a considerable amount of time and money developing this Campground and R.V. Park. It is our sincere hope that B.L.M. will seriously reconsider Item #6 and estend the visitor stay period in a Campground to nine (9) months. Thus, allowing us to recover more of our investment at a more steady rate of income. 1

Also, regarding Item #6, we have Winter Visitors that travel back and forth from many Eastern States taking care of Business at home, and then coming back to Walter's Camp to relax at their "Home away from Home." Many times they are gone for more than 72 hours because they sightsee to and from their destinations. We would hope that B.L.M. would see fit to extend absentses from 72 hours to at least 96 hours; allowing travel time at 55 mph. for many Adventuresome Visitors.

We would like to reiterate that this is not a Permanent Residence Park. Our goal, as always, is still a Family Campground and R.V. Park. Thank you very much for your reconsideration.

Sincerely,

Frank A. Dokter
Walter's Camp Inc.
President
FD/pd

TOWN OF PARKER

1314 11TH STREET • P.O. BOX 609 • PARKER, ARIZONA 85344 • (602) 669-9265

March 5, 1985

Representative Bob McClendon
1700 West Washington
Phoenix, Arizona 85007

Dear Representative McClendon:

The Parker Common Council has reviewed the Yuma District Resource Management Plan and Environmental Impact Statement Draft, attended several of the public hearings pertaining to the Study and wish to voice their objections to the proposed changes.

This letter is intended to be a formal protest to Issue 5: Rights-of-Way (Utility Corridors) and Issue 7: Wilderness (Wilderness Study Areas Cactus Plain) as they pertain to the Town of Parker.

It appears the preferred alternative of the six alternatives presented is the one most likely to be recommended for adoption by the Bureau of Land Management. While this is the better of the alternatives presented, it will never the less have a significant impact upon the Town and its future growth.

The Town of Parker, Arizona was incorporated as a township in June 1948. It encompasses one (1) square mile, is surrounded on three (3) sides by the Colorado River Indian Tribes Reservation and the Colorado River on the forth side. Thus growth, economic development and annexation of contiguous land was not possible.

Studies made by the University of Arizona, Tucson in 1978 and 1980 revealed those sections of land located in Township 8 North, Range 19 West of the Gila and Salt River Base and Meridian, La Paz County, Arizona were the most feasible lands to annex due to the proximity of the Town. Annexation proceedings were instituted in 1981 pursuant to Arizona Revised Statutes 9-471(I). The annexation was approved by the State of Arizona April 9, 1984.

The Town has to date expended more than $95,000.00 to expedite the steps necessary to allow them to proceed with this project.

Objections to Issue 5: Rights-of-Way (Utility Corridors) the preferred alternative of the Resource Management Plan calls for a one (1) mile utility corridor in the area identified as 5-14A/B Cactus Plain that would cut through the center of the Town (UC-6). UC-6B alternative

153

ROBERT J. "BOB" McLENDON
STATE REPRESENTATIVE
DISTRICTS

STATE CAPITOL, HOUSE WING
PHOENIX, ARIZONA 85007
(602) 255-4430

375 14TH STREET
YUMA, ARIZONA 85364
(602) 783-8950

Arizona House of Representatives
Phoenix, Arizona 85007

COMMITTEES:
COUNTIES & MUNICIPALITIES
GOVERNMENT OPERATIONS
NATURAL RESOURCES & ENERGY
TOURISM, PROFESSIONS & OCCUPATIONS

JOINT LEGISLATIVE OVERSIGHT COMMITTEE

March 12, 1985

Mr. J. Darwin Snell, District Manager
Bureau of Land Management
U.S. Dept. of the Interior
P.O. Box 5680
Yuma, AZ 85364

Dear Darwin:

Many thanks to you and your staff for going to the trouble to arrange the briefing in Phoenix. I'm sorry that we were not able to devote more time to your presentation, but I do appreciate the effort.

As I recall, we did discuss some concerns about the impact of the plan on Parker, especially on the new townsite. I have received a letter from Mayor Sam Davis and members of the Parker Town Council voicing some of the same concerns. I am enclosing a copy of the letter, along with resolutions from the Town Council of Parker. I am in agreement with their point of view and per our discussion the other day I feel you are too. I would appreciate a communication from your office to the Mayor and Town Council of Parker which would address these issues. 1

Thank you for your consideration and cooperation.

Sincerely,

ROBERT J. "BOB" McLENDON
State Representative

RJM:ph
Copy to:
The Honorable Sam Davis
Mayor of the Town of Parker
P.O. Box 609, Parker, AZ 85344

would take a one (1) mile strip of land from the eastern boundary of the Town limits running from the northern most to the southern most edge of the Town. If the proposed utility corridor UC-6B was moved one (1) mile to the east, it would be out of the Town limits. A more appropriate corridor would be one that parallels the Central Arizona Project.

Objection to Issue 7: Special Management and Wilderness Study Areas, the alternatives as defined would place approximately one half of the Town into the Special Management/Wilderness Study Area. This would severely hamper any projected growth or development for the Town. A better alternative would be to stop the Special Management/Wilderness Study Areas at the eastern boundary lines of the Town.

We request you send a letter to the Bureau of Land Management voicing your objection to the Yuma District Resource Management Plan and Environmental Impact Statement and the alternatives as outlined. We would also appreciate a copy of your letter to be included in our files.

Sincerely,

Samuel E. Davis
Mayor

Lloyd Correll
Vice Mayor

Lambert Haynes
Councilman

Roberta Hoffman
Councilperson

LaVell McIntire
Councilman

Frank Solper
Councilman

PROCLAMATION OF THE TOWN OF PARKER

Recitals:

1. That the Town of Parker was established in 1908 and incorporated in 1948 as a Town in accordance with the laws of the State of Arizona.

2. That the Town of Parker annex certain lands in LaPaz County and that the office of the Attorney General of the State of Arizona supplied the Town on April 9, 1984 with certification of annexation. A copy of that certificate and the supporting documents including the ordinance No. 179 of the Town of Parker and a map of the area involved is attached hereto and incorporated by reference in its entirety.

3. That the Unites States Department of Interior, Bureau of Land Management, Yuma District, has prepared a draft resource management plan and environmental impact statement (RMP-EIS) for future management options for approximately 1,192,000 acres of federal lands administered by the Bureau of Land Management through its Yuma District Office, Yuma, Arizona. That the plan focuses on resolving seven resource management issues:

Wildlife Habitat, Special Management Areas, Grazing, Land Ownership Adjustment, Rights-of-way, Recreation, and Wilderness.

4. That map No.8 of the maps supporting said plan and impact statement sets forth utility corridors of up to a mile in width. That UC-6 and UC-6B, are utility corridors which run through the heart of the area annexed by the Town of Parker.

5. That the presence of a utility corridor up to a mile in width in either UC-6 or UC-6B would cause irreparable damage to the Town in its development of the annexed area.

6. That the Town of Parker has expended since April, 1978, in excess of $95,000.00 in development of said townsite and has committed itself for a substantial additional sum incident to further developing said area.

7. That the Town of Parker respectfully requests that the said utility corridor be placed to the east outside of said corporate limits of said Town.

8. That the Town of Parker wholeheartedly endorses the Score 400 off-road race over BLM lands and the existing course site since the Town is a benefactor as is the area in general to the economic benefits generated by said race.

1

Therefore, the Town of Parker upon motion duly made and passed at a regularly scheduled Council Meeting of the Common Council of the Town of Parker, states as follows:

1. That the draft resource management plan and environmental impact statement take into account the presence of the area annexed by the Town.

2. That the plan be revised in such a way as to circumvent the Town.

3. That the Town go on formal record with the United States Department of Interior, Bureau of Land Management as wholeheartedly endorsing the Score 400 off-road race over BLM lands and existing course site since the Town is a benefactor as is the area in general, as to the economic benefits generated by said race.

4. That copies of this Proclamation be sent by the Town Manager to those officials who might have some input with regard to helping the Town grow and prosper and that they be encouraged as well as all others interested, to make comments on the draft resource management plan and environmental impact statement as requested in said plan and that comments be made in a timely fashion, namely on or before April 19, 1985.

Dated this 5th day of March, 1985.

Sam Davis, Mayor

2

154

Yuma County
Yuma, Arizona

RECEIVED
MAR 25 5 0 AM '85

OFFICE OF THE
BOARD OF SUPERVISORS
Redondo Square
P.O. Box 1112
Yuma, Arizona 85364
Phone 782-4534

BOB McCLENDON DISTRICT 1
GARY MUNK DISTRICT 2
RAY MOORE DISTRICT 3
CLYDE CUMING DISTRICT 4
PAT CONNER DISTRICT 5
ANDREW O. TORRES COUNTY ADMINISTRATOR

March 20, 1985

Mr. Alan Belt
Yuma Projects Office
Bin 12487
Yuma, AZ 85365

Dear Mr. Belt:

1 Yuma County has received a letter dated March 5, 1985, from the Mayor and Council of the Town of Parker, and I am responding at the request of Chairman Clyde Cuming. The letter identifies an objection to some proposed changes in the Yuma District Resource Management Plan and Environmental Impact Statement Draft.

Although Yuma County will not be directly affected by the concerns identified in the Proclamation of the Town of Parker to the Bureau of Land Management, we do feel it necessary to present an objection on behalf of Yuma County for the Town of Parker.

Sincerely,

Andrew O. Torres
County Administrator

RECEIVED MAR 25 1985 Yuma District Office BLM

AOT:bmp

cc: Town of Parker
Clyde Cuming

156

120,500 ACRES LOCATED ALONG COLORADO RIVER

PALO VERDE IRRIGATION DISTRICT

Office Address
180 West 14th Avenue
Blythe, California

Mailing Address
P.O. Box 1199
Blythe, California 92225

Telephone 619 922-3144

March 27, 1985

Planning Team Leader
United States Department of the Interior
Bureau of Land Management
Yuma District Office
Post Office Box 5680
Yuma AZ 85364-0697

RE: Comments on Draft Yuma District Resource Management Plan and Environmental Impact Statement issued January, 1985

Dear Planning Team Leader:

1 Palo Verde Irrigation District maintains a system of canals and open gravity drains in the Palo Verde Valley along the Colorado River in Riverside and Imperial Counties, California. The Management Plan and Environmental Impact Statement does not indicate what affects, if any, this plan has on PVID maintenance programs for our canals and drains.

2 Maps #2, #3, #4, and #5 on pages 42 thru 50 show "Palo Verde Weir". This is in error since 1957. This should be "Palo Verde Diversion Dam". This is in Section 19, T5S, R24E, SBB&M, Riverside County Calif.

3 Maps #2 - #10, #6, #7, #8, and #9 do not show Palo Verde Diversion Dam.

Sincerely,

Gerald M. Davisson
Manager

GMD/elc

157

PALO VERDE VALLEY ROD & GUN CLUB CALIFORNIA

March 25,1985
Palo Verde,Ca.

Darwin Snell Dist. Manager
B.L.M. Yuma Dist.
Yuma,Ariz. 85364

Gentleman:

At a recent meeting of the Palo Verde Valley Rod & Gun Executive Board the following was passed-

1 We recommend the same classification as proposed by the Riverside
2 District of Bureau of Land Management be continued through the Yuma District portion of Milpitas Wash clear to the Colorado River. This plan should be informative enough to the users of Off-road vehicles to protect Wildlife. This plan doesnot give adequate protection to
3 the deer in the area.
Therefore,we recommend that critical deer areas be identified and given protection under wildlife management plan..
We recommend that as Bureau of Land Management have reached their limit in saturation on the Colorado River we don't believe any more recreation is necessary.
We recommend that access into multiple use areas should be restricted to designated roads and trails, also enforcement measures should be developed so violators can be prosecuted. We feel Bureau of Land Management efforts to improve wildlife habitat shouls continue and additional actions are warranted.
We recommend they work with Fish and Game officials on violation of sites ofre-vegetation.
A Wildlife Management area should be designated, which was the original W.S.A. and that boundary should be extended northward to opposite Cibola Lake,
We recommend the custodial grazing lease be abolished as soon as possible
We support your plan on ironwood gathering and hope it is enforced. We also support the Five month occupancy limit

Respectfully,
Jack Page
Jack Page President
PALO VERDE VALLEY ROD & GUN CLUB..

It is our understanding Allen Bell will be a guest at our Aoril 4th meeting.

174

BURNET G. WOHLFORD
3355 E. VALLEY PARKWAY
ESCONDIDO, CALIFORNIA 92027
745-1983

RECEIVED
B.L.M. DISTRICT
APR 1 11 50 AM '85
YUMA, ARIZONA

March 29, 1985

Mr. J. Darwin Snell,
District Manager
U. S. Department of Interior
Bureau of Land Management
P. O. Box 5680
Yuma, AZ 85364

Dear Mr. Snell:

1 In February, we were notified of the Yuma District Resource Management Plan public hearing because we lease a small parcel of land near the Colorado River in Section 28 Township 9 RNG 24 West from the Department of Interior under permit serial # 1A-30 (A) in Yuma Valley near 8th Street and Somerton Avenue. Our legal description is Section 0028 TWN 008 RNG 024 Lot 1 and SE 4 NE 4 SEC 28 8 24 62.3 AC 5.62 AC R/W 8.84 AOL. The Department of Interior parcel is contiguous to our property and we incorporate it as part of our overall farming operation.

I would like to purchase this parcel of land from the Department of Interior to unify our farming operation. Would your Department give consideration to this proposal at a price that meets Department of Interior guidelines?

Please give this matter your consideration and advise me of your decision at your convenience.

Sincerely,
B F Wohlford
Burnet F. Wohlford

BFW:bmw

RECEIVED
APR 2 1985
Yuma District Office
BLM
DM
ADM
Planning
PCS AM
Sp Prog Spec
Env Spec
Admin
Resources
Operations
YRA
HRA
ACTAGTIV

173

Arizona
State Land Department
1624 WEST ADAMS
PHOENIX, ARIZONA 85007

BRUCE BABBITT
GOVERNOR

R. H. LANE
STATE LAND COMMISSIONER

April 1, 1985

Mr. J. Darwin Snell
District Manager, Yuma District
United States Bureau of Land Management
Post Office Box 5680
Yuma, Arizona 85364-0697

Dear Mr. Snell:

This is to confirm for the record the Land Department's comments on the Yuma District Resource Management Plan and Environmental Impact Statement that were discussed in our several meetings on the Plan.

The Land Department is willing to transfer to BLM most or all of the State sections that you have identified for acquisition. There are several parcels we may want to retain for possible future development, and we will discuss the specifics with you during a follow-up meeting, which we will try to schedule with you sometime within the next several months.

We are interested in acquiring most of the public lands in your proposed disposal areas, and will plan to identify these lands in that meeting.

1 Our only request for significant modification of the Plan relates to the Pittsburg Point area and the issue of retention and management of lands occupied by recreation concessions or leases. As you know, we want to acquire about 1150 acres in the Pittsburg Point area at Lake Havasu City that are currently under long-term lease to the State Parks Board and its sublessees and concessionaires. We ask that the Preferred Alternative be modified to provide for transfer of this land to the State.

We appreciate the opportunity to review this comprehensive planning document, and look forward to completing the land exchange transactions that will be of significant mutual benefits to the management objectives of our two agencies.

Sincerely,
Robert K. Lane
Robert K. Lane
State Land Commissioner

cc: Arizona State Clearinghouse
1700 West Washington Street, Room 505
Phoenix, Arizona 85007

180

Havasu Heights Ranch and Development Corporation
3824 South Calhoun Street • Fort Wayne, Indiana 46807 • Phone (219) 744-2172

April 3, 1985

Mr. J. Darwin Snell
Yuma District Manager
Bureau of Land Management
P.O. Box 5680
Yuma, Arizona 85364-0697

Dear Mr. Snell:

We have read the Environmental Impact Statement for the Lower Colorado River Valley and attended the public hearing in person at Lake Havasu City, and comment as follows.

We are pleased with the approach of the "planning team" to identify specific areas for controlled management plans. It appears that it would be in the best interests of all concerned to have specific plans for the various areas.

Our corporation is the holder of two Bureau of Land Management Grazing Allotments; e.g. Havasu Heights North Allotment and Havasu Heights South Allotment. These allotments have been designated ephemeral range.

We hereby express our opinion in favor of maintaining the Ephemeral Range Program for the following reasons:

1) The program keeps long standing ranch units as a whole, with lessees available to put lands to use with the approval of the Bureau of Land Management as desired.

2) The program provides a degree of control for lands which otherwise might have no specific use or be considered open.

3) It provides a degree of protection or monitoring of lands over those who would be careless or destructive.

4) The program provides the opportunity to comment on proposed useage should a portion of the lands be requested for mining claims, mineral removal, sanitary land fill, wilderness, residential, or airport useage.

5) It provides for orderly transition by concerned lessees by having preferential rights to lease acquired lands from the State of Arizona.

We are pleased with the department's endeavor to establish useful and practical plans for management of the lands in the Lower Colorado River Valley. We will cooperate with the department for good land management wherever possible through trade of our private lands, management of our leased lands, and in planning for further use or development.

Yours sincerely,

Mr. J. Darwin Snell
April 3, 1985
Page Two

Havasu Heights Ranch and Development Corporation

Robert E. Klemm
President

/gjd

Mr. Dennis Turowski
Page 2
April 4, 1985

In summary, the RMP/EIS preferred alternative will not impact current ADOT programs or planned projects and will have only minimal affect on future projects. If ADOT Environmental Planning Services can be of any additional assistance please contact Mike Dawson at 255-8638.

Very Truly yours,

PHILIP A. SHUCET, Manager
Environmental Planning Services

PAS:MRD:kj

cc: B. Darr
Don Smith, District III Engineer
Jerry Hogin, R/W
Don Mercer, Materials

181

ARIZONA DEPARTMENT OF TRANSPORTATION
HIGHWAYS DIVISION
206 South Seventeenth Avenue Phoenix, Arizona 85007

BRUCE BABBITT
Governor
WILLIAM A. ORDWAY
Director

CHARLES L. MILLER
State Engineer

April 4, 1985

Mr. Dennis Turowski, Planning Team Leader
Bureau of Land Management
Yuma District Office
P. O. Box 5680
Yuma, Arizona 85364-0697

Re: Draft Yuma District
Resource Management Plan
and Environmental Impact
Statement

Dear Mr. Turowski:

Thank you for the opportunity to comment on the referenced document. The following comments have been coordinated through our District III Engineer, Right-of-Way, Materials Section, and Transportation Planning Division.

The RMP/EIS preferred alternative does not appear to represent a significant change in the agencies planning or resource management philosophy. The state highway system does not appear to be impacted by the preferred alternative. Projects on the Arizona 5-Year Construction Program within the counties of La Paz, Mohave and Yuma will not be affected by RMP/EIS proposals. Additionally standard highway maintenance activities will not be affected.

The State Legislature is now considering a new accelerated construction program for highways. Under this program, considerable work is proposed for U.S. 95 from Yuma to Interstate 40. The special management prescription proposed in the RMP for Natural Area NA-2 (Aubrey Hills) may restrict the location of new materials pits. Restrictions on the availability of construction materials adjacent to future projects could increase construction costs.

The Wilderness proposal for Cactus Plain does not appear to affect S.R.72. As the recommendation calls for a 1/4 mile pull back from existing right-of-way ADOT does not anticipate any conflicts with highway maintenance or drainage work.

The designation of utility corridors along state highway routes should not impact the highways. The width of the corridors appears sufficient to allow flexibility in locating new utilities and reducing encroachments on the roadways. The Land Ownership Adjustment proposals may affect ADOT in terms of future right-of-way acquisitions. As ownership transfers to the State or private concerns the cost to ADOT for acquisition is likely to increase.

HIGHWAYS • AERONAUTICS • MOTOR VEHICLE • PUBLIC TRANSIT • ADMINISTRATIVE SERVICES • TRANSPORTATION PLANNING

187

OFFICE OF THE COMMISSIONER
UNITED STATES SECTION

INTERNATIONAL BOUNDARY AND WATER COMMISSION
UNITED STATES AND MEXICO
IBWC BUILDING
4110 RIO BRAVO
EL PASO, TEXAS 79902

APR 5 1985

U. S. Department of the Interior
Bureau of Land Management
Yuma District Office
P.O. Box 5680
Yuma, Arizona 85364

ATTN: J. Darwin Snell, District Manager

Dear Mr. Snell:

We appreciate your letter and draft report "Yuma District Resource Management Plan and Environmental Impact Statement", January 1985 and accordingly provide our review comments.

The International Boundary and Water Commission, United States and Mexico, is charged by the 1944 Treaty and by subsequent agreements contained in Minutes 195, 197, 208, 209 and 217 for the operation and maintenance of Morelos Dam and the floodway of the Colorado River through the limitrophe from the reach Northerly International Boundary to the Southerly International Boundary near San Luis.

The international obligation is performed by work forces of both the U.S. and Mexican Sections so that the floodway work is divided equally between the two countries.

1 By agreement design flood flow is 140,000 cfs and to insure the free passage of such flood waters the Commission maintains a cleared floodway 700 feet wide that straddles the low flow channel of the Colorado River. This activity is performed annually except in periods of flood flows.

Since this work has been performed for many years we do not perceive any change in our activities that would impact on your plans.

However we ask that your report reflect our obligations and activities and that the Bureau of Land Management plans not impact on our existing international agreements.

Sincerely,

For D. D. McNealy
Principal Engineer, Supervising

188

Parker Area Chamber of Commerce

P.O. BOX 627 PARKER, ARIZONA 85344
1217 CALIFORNIA AVENUE TELEPHONE (602) 669-2174
LA PAZ COUNTY

"Enjoy Life on the Colorado River"

April 8, 1985

J. Darwin Snell,
District Manager
Yuma District Office
PO Box 5680
Yuma, Arizona 85364-0697

Dear Mr. Snell:

The board of directors of the Parker Area Chamber of Commerce has reviewed the Yuma District Resource Management Plan and Environmental Impact Statement Draft.

As you know, we attended the public hearing in Lake Havasu and made a statement regarding the Parker Score 400 and the economic value of this event to our area. We support the Parker Score 400 fully and continue to invest many, many hours and any of our facilities that are needed for this event along working with the Havasu Resource Area Office to improve the event each year.

1 We have talked with the members of the Parker Town Council regarding the rights-of-way issues, specifically the utility corridors and wilderness study area - Cactus Plain.

It is our understanding that if utility corridor UC-6B could be moved one (1) mile to the east, this corridor would then be totally out of the area the Town of Parker is in the process of annexing for additional lands for the Town. Further if the Special Management Wilderness Study Area ended at the eastern boundary of the Town's annexation area, the Town would then have no loss of lands and could proceed with their annexation process.

The Parker Area Chamber of Commerce is in support of the Town of Parkers Common Council position and request that the UC-6B corridor be moved one (1) mile to the east and that the Cactus Plain Wilderness Study Area end at the eastern boundary of the Town annexation area.

Thank you for this opportunity to review the Management Plan and to make our concerns known to you.

Yours very truly,
Dorothy Randall
Dorothy Randall,
Executive Director
For the Board of Directors

CC: Parker Town Council
DR:d

WHEN IN THE PARKER AREA, BE SURE TO SEE
- PARKER DAM The World's Deepest Dam
- BUCKSKIN MT. STATE PARK Boating, camping, fishing, skiing, in a scenic mountain setting
- AH VILLA COUNTY PARK 640 acres of outdoor and water recreation
- THE COLORADO RIVER INDIAN TRIBAL COUNCIL CHAMBERS, LIBRARY AND MUSEUM
- JOIN US FOR THE Parker Enduro, Score 400, Innertube Race and other annual events

Defenders OF WILDLIFE

TO: J. D. SNELL, BLM YUMA DISTRICT OFFICE

FROM: STEVE JOHNSON, SOUTHWEST REP, DEFENDERS OF WILDLIFE

SUBJECT: COMMENTS ON THE DRAFT YUMA DISTRICT RMP

RIPARIAN AREAS:

1 Approximately 25,000 acres are to be managed as "priority wildlife areas." What does this mean, specifically? Elsewhere it is stated that wildlife habitat would be a priority consideration on approximately 249,640 acres under the Proposed RMP. What is the difference between the two? Will either or both of the above areas be grazed by livestock? If so, I submit that there are no ways to mitigate livestock impacts on wildlife habitat in an area of so little rain and such great fragility.

2 Does the BLM plan to fence off <u>any</u> riparian habitat from cattle? Based on my own observations all over the arid southwest, I do not believe that placement of water, salt, or any other management techniques will prevent cattle from overusing riparian habitat. In much of the southwest, riparian areas are the only places that have any forage.

3 According to Dr. Robert Ohmart of ASU, the largest contiguous stand of willow-cottonwood habitat in the Yuma RMP area is only 70 acres. Does the BLM envision any efforts to expand the size of these critical willow-cottonwood areas? Many of the species of wildlife listed as rare, endangered, uncommon, etc. are highly

SOUTHWEST OFFICE: 13795 N. COMO DRIVE, TUCSON, ARIZONA 85741 • (602) 297-1434
NATIONAL OFFICE: 1244 NINETEENTH STREET, NW • WASHINGTON, DC 20036 • (202) 659-9510

192

Defenders OF WILDLIFE

April 9, 1985

Mr. J.D. Snell
Bureau of Land Management
Yuma District Office
P.O. Box 5680
Yuma, Arizona 85364

Dear Mr. Snell:

I enclose my comments on the Draft Yuma District RMP. While I strongly support much of the Draft, I was disappointed with three general areas: livestock grazing, riparian management, and a general lack of specificity with regard to the "priority wildlife areas."

I wish I had time for a more complete set of responses, but it seems that a lot of other things are in the hopper at the same time. Thanks for the opportunity.

Sincerely,
Steve Johnson
Steve Johnson

SOUTHWEST OFFICE: 13795 N. COMO DRIVE, TUCSON, ARIZONA 85741 • (602) 297-1434
NATIONAL OFFICE: 1244 NINETEENTH STREET, NW • WASHINGTON, DC 20036 • (202) 659-9510

Defenders OF WILDLIFE

3 dependent upon this riparian resource. I would like to see specifics in the Final RMP on BLM's plans on riparian enhancement and protection.

4 The Lower Colorado River is now believed to harbor one of the largest population remnants of the Western Yellow-Billed Cuckoo, which is one of the ten wildlife species chosen by Defenders of Wildlife for special emphasis(see enclosed packet). Consequently, I am most interested in specifics on how the Yuma District RMP will benefit the Cuckoo in particular.

GRAZING:

I noted that the four perennial-ephemeral allotments contain about 328 cattle on a year-'round basis(3,941 AUM's divided by 12). This means that about 1,117 acres are needed, on average, per cow per year. This is ridiculous. Why bother? At today's AUM price of $1.35, BLM gets $5,320 in grazing fees, or less than 1.5 cents per acre per year. While I realize that grazing is one of the multiple uses of the public land, it is not possible to run cattle all year on such arid land without severely damaging the potential for <u>all</u> other multiple uses, especially wildlife.

5

6 On p. 57, the Plan states that when the galleta grass is dormant and unpalatable, livestock must "...depend on annuals and available browse for forage." Wouldn't this result in competition with deer? Yet, on p. 72, it is stated that "There is little competition between deer and domestic livestock." If cattle are on allotments all year(as with the P-E allotments), there would

Defenders OF WILDLIFE

6 have to be competition with deer, and with many other species also.

7 Please explain the circumstances in which supplemental feeding would facilitate "...achieving the overall management objectives for the Cactus Plain area." In my opinion, supplemental feeding is very destructive of multiple use values, as it keeps livestock present in areas where they could not otherwise survive. Both native plants and wildlife are at a low ebb during such times, and are extremely vulnerable. I do not believe that supplemental feeding is ever appropriate on our public lands. If there is no natural feed out there, the cattle should be removed.

8 With regard to the Special Ephemeral Rule(p.261), are there specific requirements that a minimum amount of such ephemeral forage be left for wildlife? As you may know, the desert tortoise is highly dependent upon such plants. Is there a minimum requirement in pounds per acre that must be present before cattle are released onto the land?

Stan Johnson

4

Communications Sites
Page 2

1 frequencies used. This allows each frequency to be reused every few miles and allows multiple conversations where previously only one could exist. The limitation of 8 communications sites would limit the application of a cellular system.

2 The term communications site is a vague term and is interpreted differently by different organizations. It would be most helpful if the BLM study team would review the following types of communications facilities to determine which ones are to be considered a communications site and which ones are not. A proper definition could then be placed in the Yuma District's plan glossary to clarify this matter.

Also, it would be helpful to know how BLM would handle requests for the development of the following types of communications facilities:

MICROWAVE REFLECTOR: Similar to a billboard sign in construction, they range from 10'(h) x 16'(w) to 40'(h) x 60'(w). They can be installed by helicopter and require minimal maintenance, normally only once or twice a year.

HELICOPTER DROP STATION: Consisting of one or two weather-proof cabinets, approximately 2' x 2' x 4' or 6' high, a few solar panels and one or two antennas. All of the equipment is delivered to the site by a helicopter. A small cement pad is installed to set the equipment on, or in some cases, the equipment is set on the rocks and secured by guy wires connected to anchors driven in the mountain. Normal maintenance is once or twice a year and a helicopter is used for transporting the technicians and their test equipment.

SINGLE USER SITE: Consists of a single tower, generator, possible solar panels and/or a power line to the site with a chain link fence to enclose the area. This site could be helicopter access only, or it might have an access road.

MULTI-USER SITE: A Communications site which is shared by a number of independent users. Each user is assigned a plot of ground where he constructs a building, tower, generator, and/or power line. The common access road and powerline connects to each of the users' sites.

It is our opinion that only the multi-user sites should be defined as communications sites, and limited as per the Yuma District Resource Management Plan and Environmental Impact Statement (Draft). The other types of communications facilities described above should not be restricted, but should be considered on an individual basis.

195

Central Arizona Water Conservation District
23636 NORTH 7TH STREET
PHOENIX, ARIZONA 85024
(602) 870-2333

April 8, 1985

U.S. Department of the Interior
Bureau of Land Management
Yuma District Office
P.O. Box 5680
Yuma, AZ 85364-0697

ATTENTION: Mr. J. Darwin Snell, District Manager

Dear Mr. Snell:

These comments are directed toward the communications sites as discussed in the draft of the Yuma District Resource Management Plan and Environmental Impact Statement.

The Central Arizona Water Conservation District (CAWCD), Electronics Branch, supports the Bureau of Land Management (BLM) planning process and objectives for the Yuma District.

CAWCD is the Operations and Maintenance contractor for the Central Arizona Project (CAP). The CAWCD Electronics Branch is actively assisting the U.S. Bureau of Reclamation, Power Division, in the development of the CAP communications systems. Our assistance includes engineering, procurement, installation and maintenance of a large multiple site microwave system, underground cable, and Programmable Supervisory Control System, along with mobile and telephone systems which cover the southern half of Arizona.

1 The major area of our concern with the plan relates to the communications sites. If the report is taken literally, there will only be a maximum of eight communications sites allowed in the Yuma District. If all communications users are restricted to these eight sites in the Yuma District, we cannot properly manage the use of the radio spectrum. The radio spectrum is also a limited natural resource and must be managed wisely or those who need to communicate will not be able to do so.

Efficient radio spectrum management requires each user to use only enough transmitter power to cover the area needed. Additional efficiency can be obtained by using the cellular technique. This is done by installing low-powered radio transmitters every few miles in small cells and alternating the

Communications Sites
Page 3

We would like to thank the Yuma District of the Bureau of Land Management for this opportunity to comment on your resource management plan.

John E. Simmons
John E. Simmons
Electronics Branch Manager

APPROVED:

Thomas C. Clark
Tom C. Clark
General Manager

JES/skm

cc: Mr. James May
Area Manager
Havasu Resource Area Office
3189 Sweetwater Avenue
Lake Havasu City, AZ 86403

196

National Parks & Conservation Association
1701 Eighteenth Street, N.W. • Washington, D.C. 20009

RUSSELL D. BUTCHER
Regional Representative
SOUTHWEST & CALIFORNIA
Box 67
Cottonwood, AZ 86326
(602) 634-5758

(202) 265-2717

April 13, 1985

Planning Team Leader
Yuma District Office
Bureau of Land Management
P.O. Box 5680
Yuma, Arizona 85364

RE: Draft Yuma District
RMP & EIS

Dear Sir:

We appreciate the opportunity to comment briefly on the wilderness aspect of the Draft Yuma District Resource Management Plan & Environmental Impact Statement.

Concerning the one wilderness study area which is recommended suitable for wilderness, National Parks & Conservation Association agrees that this area qualifies as nationally significant--with its unusual stabilized dune ecology--and as worthy of the kind of protection which the National Wilderness Preservation System can afford. We do question the manageability of the area...especially along the western end where it appears there'd be little in the way of any natural features defining the wilderness boundary. We question following straight section lines, and hope that the wilderness can be carried all the way to the western edge of the WSA...to the powerline.

Regarding other WSAs, notably Swansea, Muggins, and the Trigo Mountains units, may we urge that an attempt be made to assemble a group of interested, knowledgeable, and articulate individuals, representing the environmental, grazing, and mining points of view--much as we succeeded in doing for the Arizona Strip District wilderness. Such a group, we believe, could constructively discuss and explore all of the relevant issues... to help determine just how significant are the various resource values--from wilderness to minerals. There appears to be a strong dissatisfaction over the BLM's wilderness recommendation by those especially concerned with the Yuma District. It just might prove helpful to explore the idea of negotiations--either leading to an affirmation that the agency's recommendation is in fact correct; or resulting in a consensus that some of the reasons for recommending against wilderness are not as significant as alleged.

197

United States Department of the Interior
BUREAU OF MINES
P. O. BOX 25086
BUILDING 20, DENVER FEDERAL CENTER
DENVER, COLORADO 80225
Intermountain Field Operations Center

April 12, 1985

Your reference:
1601 (YDO)

Memorandum

To: Planning Team Leader, Yuma District Office, Bureau of Land Management, Post Office Box 5680, Yuma, Arizona 85364-0697

From: Chief, Intermountain Field Operations Center

Subject: Review of Yuma District Resource Management Plan and Draft Environmental Impact Statement (Yuma District)

Personnel of the Intermountain Field Operations Center, Bureau of Mines, have reviewed the subject document as requested. The document discusses five alternatives and the preferred plan for the management of the Yuma District. The alternatives deal with the management of various resources, but the Bureau of Mines interest primarily pertains to mineral resources and mineral-producing facilities and how they would be impacted.

The mineral resources of this district are stated on p. 57 (Table 3-2) of the document. These mineral resources agree with those of the Bureau of Mines Mineral Industry Location System (MILS) commodity listing for the counties in the district. The mineral resources are adequately discussed as to how each alternative and the preferred plan will affect the mineral resources.

We appreciate the time and effort spent in the preparation of the Resource Management Plan and the Environmental Impact Statement (RMP/EIS). We have no objection to the document as written. Thank you for the opportunity to comment.

William Cochran

William Cochran

2-April 13, 1985
NPCA comments on Yuma District draft RMP & EIS

At the recent wilderness dedication ceremony on the Arizona Strip, Interior Secretary Hodel and a number of the members of the Congressional delegation applauded the negotiational process by which the Arizona Strip wilderness compromise was achieved, and they hoped and urged this process would be used elsewhere.

We hope the Yuma District will provide such another opportunity.

Sincerely,

Russell D. Butcher
Southwest & California Representative
Box 67, Cottonwood, AZ 86326

cc: D. Dean Bibles
Carey Meister

199

April 11, 1985

Richard Pruett
5428 W. Altadena
Glendale, Arizona 85304

J. Darwin Snell
BLM Yuma District
P. O. Box 5680
Yuma, Arizona 85364-0697

Dear Mr. Snell:

I appreciate you sending me the draft of the Yuma District Resource Management Plan and E.I.S. I did not realize that this was in as much depth as it is but I wanted to voice my opinion due to the fact that my family, as does many other familes that we associate with, use the land in question frequently for many reasons but mainly for off-road vehicle recreation and camping. It has come to surface over the last few years that it seems to be a constant battle to keep the public lands open for the public to use. I am in total agreement with Alternate B although I have a few questions that possibly you or someone on your staff can answer. Under your chart Table S1 Comparative Summary of Alternatives and under the sub-title of Recreation Letter C Management of Concessions and Leases under Alternate B it reads to me as though the lease holder can virtually do anything he wants as far as expansion of concessions in the lease areas into adjacent federal land. I would imagine that this is not a runaway type deal where they could continually build and build and build more leasehold improvements, etc. I would imagine that it is monitored through different permits and rules and regulations. If that is not so, I think that one area is not worded properly. I think there should be some restrictions on how much they can expand the concessions, etc. 1

Under the same heading under sub-title Recreation Resources, Alternate B it states that overall long-term increases of developed recreation opportunities, but loss of 5,000 visitor days of opportunities per year, and directly under that it also states substantial change in users clientele to occur due to shift in types of recreation facilities provided the elimination of day use opportunities of off road vehicle related noise and safety conditions. The way this reads to me is that part of the day use area would actually not be available because these day use areas would be converted into long term areas or short term areas whereas the camping public would be able to stay there for up to 14 days or possibly extended stays. That is what I am reading into what those two statements say. If I am incorrect, please have one of your staff let me know. 2

J. Darwin Snell
April 11, 1985

Page Two

Other than those questions I am delighted that I had the opportunity to review the Impact Statement and again, want to voice my position as being strongly in favor of Alternate B.

Kindest Personal Regards,

Dick.

Dick Pruett

Mr. Darwin Snell
April 11, 1985
Page Two

Issue 5: Rights-of-Way for Utility Corridors and Communication Sites.

1 The prefered alternative of the Resource Management Plan, identified on map 8 as UC-6, is a one-mile wide corridor that extends through the center of the Town of Parker. The alternative corridor designated as UC-6B is also located within the Town of Parker. The Town of Parker is surrounded on three sides by the Colorado River Indian Reservation and on the other by the Colorado River. The recent annexation by the Town of Parker allows for future growth and development for the Town and La Paz County. With only five percent (5%) privately owned lands in La Paz County, the placement of the utility corridor within the incorporated boundaries of the Town would further restrict growth and development in La Paz County. The Board of Supervisors is opposing the placement of this utility corridor within the incorporated boundaries of the Town of Parker. We would support the utility corridor being placed one mile to the east which would place the corridor outside the incorporated boundaries of the Town.

Issue 6: Recreation:

The Board of Supervisors supports the designation of a permanent race course for the Parker 400 Race. A survey conducted by the Parker Area Chamber of Commerce of the financial institutions indicated an increase in deposits over the race weekends of $1,500,000. This figure did not include any credit card purchases at service stations, restaurants and motels. This race is a family oriented sport and a very desirable form of recreation for this County.

The Board of Supervisors also supports the designation of the Ehrenberg Sand Bowl area for off-road vehicle use.

Issue 7: Wilderness

The designation of the Cactus Plain Wilderness Study Area #5-14 A/B consisting of 50,550 acres further restricts potential growth and development in La Paz County.

Land exchange between the Bureau of Land Management and the State Land Department is a vital concern of the Board of Supervisors. The Board of Supervisors respectively requests that all land exchanges be made inside La Paz County. Again, this is very important for the future growth and development of La Paz County.

The Board of Supervisors would like to express their appreciation for the extra efforts put forth by you and your staff, in coming to our County to review the Draft Resource Management Plan.

The issues addressed here are of concern and importance to La Paz County. We are requesting consideration be given to each issue.

Sincerely,

Donald D. Denton
Chairman

ep

200

La Paz County Board of Supervisors
1301 ARIZONA AVENUE, SUITE 4
POST OFFICE BOX C
PARKER, ARIZONA 85344
(602) 669-6115

MARYETTA TROSIE
DISTRICT #1
DONALD D. DENTON
DISTRICT #3
WAYNE SWEETLAND
DISTRICT #1
NETA J. BOWMAN
CLERK/COUNTY MANAGER

April 11, 1985

Mr. Darwin Snell
United States Department of Interior
Bureau of Land Management
Yuma District Office
Post Office Box 5690
Yuma, Arizona 85364

Dear Mr. Snell:

Re: Draft Yuma District Resource Management Plan and Environmental Impact Statement

The La Paz County Board of Supervisors met in regular session on April 1, 1985 and unanimously voted to forward the following comments and request that these comments be given consideration in preparing the Final Resource Management Plan and Environmental Impact Statement for the Yuma District planning area.

La Paz County consists of a total of 2,873,455 acres broken down into the following categories:

- 1,746,605 acres of public lands including BLM lands and Reclamation withdrawn lands along the Colorado River.
- 161,260 acres of Federal lands in wildlife refuges.
- 395,201 acres of Federal lands in military reservations.
- 1,063 acres purchased by the Bureau of Reclamation for the Central Arizona Project.
- 198,970 acres of State lands.
- 229,785 acres of Indian lands.
- 140,571 acres of Private lands.

The above figures indicate eighty percent (80%) of all lands in La Paz County are in Federal ownership with five percent (5%) representing private ownership.

201

STATE OF CALIFORNIA—THE RESOURCES AGENCY
GEORGE DEUKMEJIAN, Governor

COLORADO RIVER BOARD OF CALIFORNIA
107 SOUTH BROADWAY, ROOM #103
LOS ANGELES, CALIFORNIA 90012
(213) 620-4480

April 12, 1985

Mr. J. Darwin Snell, District Manager
Yuma District Office
U.S. Bureau of Land Management
P.O. Box 5680
3150 Winsor Avenue
Yuma, Arizona 85364-0697

Dear Mr. Snell:

Thank you for providing this office with a copy of the draft Resource Management Plan (RMP) and Environmental Impact Statement (EIS) for the Yuma District planning area. We have reviewed the report and have the following comments:

As we stated in a January 4, 1984, letter to BLM commenting on draft alternatives for the RMP, we are pleased that the plan calls for relocation of recreation facilities outside of the floodplain. It is consistent with the intent of H.R. 1246, proposed legislation to establish a federally declared floodway for the Colorado River below Davis Dam, introduced in the House of Representatives on February 25, 1985.

We are also pleased to see that existing agricultural leases and permits for lands without water rights will be cancelled and managed for recreation and/or wildlife values.

Thank you for the opportunity to comment on this report.

Sincerely,

Vernon E. Valentine
for Chief Engineer

cc: N. W. Plummer, Regional Director
Lower Colorado Regional Office, USBR
Boulder City, Nevada

202

GOLD FIELDS MINING CORPORATION
A Consolidated Gold Fields Group Company

Please reply to the address indicated.

P. O. Box 329
1201 West Ninth Street
Yuma, Arizona 85364
Telephone (602) 782-1695

200 Union Boulevard—Suite 500
Lakewood, Colorado 80228
Telephone (303) 988-0360/Telex 45-653

Telecopier (303) 989-6786

April 15, 1985

Planning Team Leader
United States Dept. of the Interior
Bureau of Land Management
Yuma District Office
P. O. Box 5680
Yuma, Arizona 85364-0697

RE: YUMA DISTRICT DRAFT RESOURCE MANAGEMENT PLAN AND ENVIRONMENTAL IMPACT STATEMENT

Dear Team Leader:

I have read and reviewed the Yuma District Draft RMP-EIS and I feel that I need to make some comments concerning the plan. I agree with the Preferred Alternative for 12 of the 18 WSA's included in the plan which encompass 48,135 acres of the 205,105 acre total WSA package under consideration. I believe this alternative reflects careful evaluation of these WSA's and recognized the need for multiple use of our public lands.

(1) **Crossman Peak WSA** - (AZ-5-7B) 22,915 acres
Recommendation - Alternative B

The 1983 U.S. Bureau of Mines Mineral Investigation of the Crossman Peak WSA (Open File Report MLA 82-83) as well as the presence of numerous mines, shafts, and prospects attests to the fact that the potential is high for the discovery of gold, silver, and potentially lead and zinc deposits in the WSA. The
1 designation of the Crossman Peak WSA as a Natural Scenic Area would unduly restrict exploration in an area of high mineral potential.

(2) **Gibraltar Mountain WSA** - (AZ-5-12) 7,870 acres
Recommendation - Alternative B

Gold and copper prospects and small mines occur within the WSA. The potential for significant exposed and buried mineral resources are high. Designation of all or part of the Gibraltar
2 Mountain WSA as a Special Management Area would prevent multiple use (exploration) of these resources.

Planning Team Leader
April 15, 1985
Page Two

(3) **Cactus Plain WSA** (AZ-5-14A/B) 70,360 acres
Recommendation - Alternative B

Areas of bedrock rimming the extensive alluvial cover of the Cactus Plain WSA have long been prospected for gold, copper, barium, and uranium. The buried potential for significant resources of these elements is rated moderate to high. Designation of this WSA as an Outstanding Natural Area would
3 unduly restrict exploration in the area. Since several wilderness areas exist in the region there is no need to balance the geographical location of wilderness.

(4) **Muggins Mountains WSA** (AZ-5-53A) 14,455 acres
Recommendation - Alternative B

A recent 1984 Assessment of the Mineral Resources of the Muggings Mountain (USGS Open File Report 84-662) together with recent geologic thinking suggests the potential for the occurrence of significant gold and/or uranium resources is important. The Muggins have long been a source for placer gold (Arizona Bureau of Geology and Mineral Technology, Bulletin 168, 1981) in Arizona. The designation of the Muggins Mountains WSA
4 as an Outstanding Natural Area would not enhance the value of the WSA and would restrict future exploration activity.

(5) **Trigo Mountains WSA** (AZ-5-23A) 36,870 acres

(6) **South Trigo Mountains WSA** (AZ-5-23B) 4,500 acres
Recommendation - Alternative B for both WSA's

The Trigo Mountains WSA parcels contain pits, shafts, and placer areas formerly mined for gold and silver (1933 Arizona Bureau of Mines Bulletin 134). A producing silver district in the 1930's (with minor lead and zinc composed of the Red Cloud, Dives, Clip, and Black Rock mines occurs along the eastern edge of the South Trigo Mountains WSA. The potential for the

Planning Team Leader
April 15, 1985
Page Three

discovery of significant gold and silver resources within the
5 WSA's is moderate to high. The designation of these WSA's as Special Wildlife Habitat areas would unduly restrict multiple use and exploraiton within these areas.

Thank you for your consideration of these comments.

GOLD FIELDS MINING CORPORATION

William C. Feirn
Area Geologist
Southwest Region

WCF:rl

c: R. H. Russell
W. C. Feirn

203

RECEIVED
BLM DISTRICT
APR 17 7 8 AM '85
April 2, 1985 YUMA

Allen Belt
P.O. Box 5680
Yuma, Az. 85364

Dear Allen,

Comments on the ENVIRONMENTAL IMPACT STATEMENT of YUMA DISTRICT, Resource Management Plan.

"My position on allowing development right next to the Cactus Plain is not in the public interest." This would eventually ruin the Cactus Plain as people would not consider it a wilderness area once they lived next to it. The expense of moving a UTILITY CORRIDOR is also not in the public interest. There is many acres of land more suitable for development in this area.

Sincerely

Buck Burdette

Buck Burdette
Box #1, Quartzsite, Az. 85346

Enc. Info.

RECEIVED
APR 19 1985
Yuma District Office
BLM
Dist
Adm
Planning
Pub Aff
Sp Prog Spec
Rec Spec
Admin
Resources
Operations
YRA
NRA
ACTION BY

204

Box 475
Somerton, Arizona
85350
April 14, 1985

Bureau of Land Management
Yuma District Office
P.O.Box 5680
Yuma, Arizona

Dear Mr. Snell:

After reading the Yuma District Resource Management Plan I wish to make the following comments on land acquisition and disposal for the preferred, D, and E alternatives.

The preferred alternative's positive point is that it eliminates any acquisition for grazing purposes. But it has an extremely low per cent of acquisition for wilderness purposes exclusively. Only about nine per cent of all land to be acquired would be for wilderness.

In the preferred alternative there is a loss of acreage in comparing acquisitions and disposal. B.L.M. lands will be reduced by 14, 260 acres in this alternative. Also in the preferred alternative land marked for disposal is in areas D-1 through D-9. The larger part of this is in the Yuma area, especially D-4. No acquisitions will be made in this area. In fact the closest acquisition to the Yuma area will be A-88.

Alternative D which is "balanced protection" is not really balanced. Only one fourth of land acquisition will be for wilderness. Alternative D is favorable to grazing as 19% of lands to be acquired are for grazing. This compares with only 25% of land acquisitions for wilderness. In fact, in the Cactus Plain area, 6720 acres are to be acquired for grazing and only 2720 for wilderness.

1 It seems that grazing and any agricultural activity is not at all consistent with the multiple use philosophy of B.L.M. as it supports and advances one means of livelihood by allowing cattle companies to use public land for their own financial gain. Figures should be made available for each grazing area showing how much is paid by those using the grazing lands, and how much it costs B.L.M. to manage these lands. It seems more consistent to curtail or stop entirely all grazing on B.L.M. lands. It is stated that acres to be acquired are to "benefit federal programs". Is grazing a federal program?

Alternative E has no all-over acreage loss and no acquisitions for grazing. However of the acres to be acquired, only 30% are for wilderness. Seventy per cent of all lands to be acquired under this alternative are not consistent with its protection philosophy. It is difficult to see how lands acquired for wildlife can benefit wildlife completely if they are open to other uses as well.

Please consider changing the per cent of land acquired for wilderness if the preferred alternative is adopted. Also if the preferred is adopted, please balance disposals and acquisitions so there is no all ,over acreage loss.

If alternative D is adopted, please eliminate the acreage for grazing in lands to be acquired and raise the per cent of lands acquired for wilderness use.

If alternative E is adopted, please raise the per cent of land for wilderness in land acquisition acreage so this will be a maximum protection alternative as stated.

I appreciate receiving the Resource Management Plan and being allowed to make comments on it. I also appreciate all the time and effort that B.L.M. spent in preparing this plan.

Sincerely,
Kathryn A. Michel
Kathryn A. Michel

205

La Paz County Board of Supervisors
1301 ARIZONA AVENUE, SUITE C
POST OFFICE BOX C
PARKER, ARIZONA 85344
(602) 669-6115

MARYETTA TOOSIE DISTRICT #1
DONALD D. DENTON DISTRICT #2
WAYNE SWEETLAND DISTRICT #3
NETA I. BOWMAN CLERK/COUNTY MANAGER

April 11, 1985

Mr. Darwin Snell
United States Department of Interior
Bureau of Land Management
Yuma District Office
Post Office Box 5690
Yuma, Arizona 85364

Dear Mr. Snell:

Re: Yuma District Management Plan and Environmental Impact Statement

The La Paz County Board of Supervisors at a regular meeting held February 19, 1985 appointed an eighteen (18) member Site Selection Committee to present its recommendation for a site which would be best suited for a county complex to accommodate all functions of County Government and a Jail facility.

The Site Selection Committee is seriously considering the property that has been annexed by the Town of Parker as a viable site for the La Paz County complex and jail. This site is within the incorporated Town of Parker and more centrally located to the unincorporated areas in La Paz County.

1 This letter is intended as a formal protest to the one mile wide utility corridor located within the boundaries of the Town of Parker. This would restrict the development of the newly incorporated area. The Committee would like to recommend that the utility corridor be placed one mile to the east, which would place it outside the incorporated limits of the Town of Parker.

We urge you to give serious consideration to our request.

Sincerely,
A.J. Percuoco
A.J. Percuoco, Chairman
Site Selection Committee

ep

APR 16 1985

207

1885

The University of Arizona
College of Agriculture
School of Renewable Natural Resources
325 Biological Sciences East Building
Tucson, Arizona 85721

April 15, 1985

1985
A Proud Beginning

Dennis Turowski
Planning Team Leader
Bureau of Land Management
Yuma District Office
P. O. Box 5680
Yuma, AZ 85364-0697

Dear Sir:

The University of Arizona Range Task Force has reviewed the "Draft Yuma District Resource Management Plan and Environmental Impact Statement". We find no major issues of concern relating to livestock grazing management in the proposed alternative in this plan. However, we offer the following comments.

1. We support the current direction of the BLM in basing management decisions on information gathered through monitoring, rather than through inadequate inventory and modeling procedures as has been done in the past. We have previously reviewed the Lower Gila Monitoring Plan which is stated as the basis for monitoring on the Yuma District.

2. We note that the discussion of grazing management under the proposed alternative recognizes changes in grazing management as a means for alleviating grazing problems. However, this option was not emphasized in development of planning issues which provides the framework for the RMP. We encourage the BLM to emphasize grazing management as a range management tool with less emphasis on permit reductions.

1 3. The plan recognizes (on page 58) deficiencies in the "Range Condition" concept used by the BLM for establishing management objectives. However, management objectives as stated in the last paragraph on page 14 are based on this concept. This issue needs clarification.

4. Throughout the RMP, the terms "range" and "rangeland" are consistently equated with livestock grazing use or management. This is especially evident in the use of the terms in headings and sub-headings. Range is a type of land, not a land use activity or a commodity.

Please contact us if you have questions or if we can be of assistance.

Sincerely,
Del W. Despain
Del W. Despain
University of Arizona Range Task Force

208

BLACK MEADOW LANDING
ON LAKE HAVASU
PARKER DAM, CALIF. 92267 PHONE: 619/663-3811 or 663-4901

BOATING•FISHING
WATERSKIING•CAMPING

April 15, 1985

Planning Team Leader
United States Dept. of the Interior
Bureau of Land Management
P. O. Box 5680
Yuma, AZ 85364-0697

Dear Sir:

SUBJECT: Resource Management Plan

Please accept this letter as Black Meadow Landing's response to your Resource Management Plan.

We feel that the "Preferred Alternative" Plan is the best one flexible enough to meet the demands of the concessionaire as well as the public. We, therefore, are in agreeance with the Bureau of Land Management that this plan will best suit the needs of all concerned.

Thank you for your time and consideration in this matter.

Sincerely,

BLACK MEADOW LANDING

George (Sandy) H. Field
Concessionaire

GHF:djh

BLM
Page Two
April 13, 1985

2 | struction reimbursement should be increased to maintain development and ensure new development.

The aforementioned are some of the responses that the Association would like to see considered when the Bureau of Land Management formulates a final Resource Management Plan beneficial to all.

We feel that the "Preferred Alternative" Plan is flexible enough to best suit our needs as well as accomplish the best means possible to service the public by the concessionaires.

Sincerely,

COLORADO RIVER DEVELOPMENT ASSOCIATION

Phil Younis
President

djh

209

COLORADO RIVER DEVELOPMENT ASSOCIATION

April 13, 1985

Planning Team Leader
United States Dept. of the Interior
Bureau of Land Management
P. O. Box 5680
Yuma, AZ 85364-0697

Dear Sir:

SUBJECT: Resource Management Plan

The following are responses of the Colorado River Development Association regarding your Resource Management Plan:

1 | 1. Concessionaires, as a whole, to improve their properties and to do things that the Bureau of Land Management wants for public use, needs long term leases. In order to obtain financing, banks are demanding fifty years so that they may make a fair return on their investment.

BLM needs to have flexibility to grant additional term for satisfactory performance or adverse economic impact. By granting extended term for adverse economic impact, BLM ensures the quality of the concessions and also ensures they will have a tool in which to influence the concessionaires to operate up to the BLM standards.

2. Due to the increased demand by the public for the land usage, all of the concessionaires need to be able to expand their facilities. (In other words, the Association agrees with Page 20 of the RMP.)

2 | 3. While the Association recognizes the need for the Government to get a fair return on their investment, there are both direct and indirect returns that they do need by having the concessions operate at an optimum level.

The direct benefits they get are: Public service, franchise fees and percentage of gross. The indirect benefits are: Creating jobs, maintaining the lands, increasing and supporting the county tax base (local economy), state sales tax, able to confine large scale recreation to small areas, thereby preserving the environment of the surrounding area; protecting the environment by having supervised, high-impact visitation on small areas of land.

The Association therefore would point out that higher use fees will result in less than optimum operation. The present formula for con-

210

STATE OF CALIFORNIA—THE RESOURCES AGENCY

GEORGE DEUKMEJIAN, *Governor*

DEPARTMENT OF CONSERVATION
DIVISION OF ADMINISTRATION AND LEGISLATION
DIVISION OF LAND RESOURCE PROTECTION
DIVISION OF MINES AND GEOLOGY
DIVISION OF OIL AND GAS

1416 Ninth Street
SACRAMENTO, CA 95814

APR 1 5 1985

Mr. J. Darwin Snell, District Manager
Yuma District Office
Bureau of Land Management
U.S. Department of the Interior
P.O. Box 5680
Yuma, Arizona 85364

Dear Mr. Snell:

Draft Resource Management Plan and Environmental Impact Statement for the Yuma District Planning Area - 1601 (YDO)

The Department's Division of Mines and Geology (DMG) has reviewed the Bureau of Land Management's Draft Resource Management Plan (RMP) and Environmental Impact Statement (DEIS) for the Yuma District Planning area. We have confined our comments to the mineral resource aspects of the California portion of the planning area.

SUMMARY COMMENTS AND RECOMMENDATIONS

The following comments are related to general deficiencies observed in the Draft EIS.

1 | 1. The list of references and criteria used in the evaluation of mineral resources is incomplete. It is impossible to review thoroughly the data and methodology used to determine the potential for mineral resource development in each of the areas without adequate documentation.

2 | 2. No definition of the term, "mineral resource potential" is given. Therefore the term "moderate potential" cannot be related to other resource models and, without explanation, has little meaning.

3 | 3. Table 4-9 on page 87 assigns moderate potential for metallics and uranium in the Little Picacho Peak South Wilderness Study Area (WSA). On page 212 in Appendix B, the description of resources for Little Picacho Peak Addition (5-35) does not mention uranium in the description of energy and minerals. It is also unclear why the names of the area are different.

4. All but 640 acres of the WSAs in California are withdrawn from mineral entry. Most of the WSAs in Arizona are open for mineral location. No explanation is given for this.

Mr. J. Darwin Snell
Page 2

4 5. On page 108 the environmental consequences for Alternative B states that beneficial impacts on mineral development could result from the provision for no utility corridors. Utility corridors are not mentioned under mineral impacts nor is there any information as to the mineral potential of these areas. If the exclusion of these areas will benefit mineral development then conversely the inclusion of utility corridors could have adverse impacts on mineral development. The Final EIS should contain a complete discussion and evaluation of mineral resource development in utility corridors.

5 6. A comprehensive evaluation of the mineral potential of proposed land acquisitions may uncover areas of mineral potential that would offset the loss of other areas which would be closed to mineral entry. Such an evaluation should be included in the Final EIS.

RECOMMENDATIONS

We recommend the following items be addressed in the Final EIS in order to correct the shortcomings of the Draft Environmental Impact Statement with respect to mineral resource impacts.

6 1. The mineral resource potential of all Special Management Areas (SMAs) should be thoroughly evaluated, as it is for all wilderness areas. The closure of SMAs to mineral entry may pose a greater impact on mineral resource development than the closure of the wilderness areas because of the considerably larger total area of these lands.

2. The impacts of closure of SMAs to mineral resource development should be thoroughly described and evaluated in order to convey a clear understanding of resource status of these lands.

3. A complete discussion of area management rules and regulations should be provided for designated Areas of Critical Environmental Concern or Outstanding Natural Areas in order to evaluate the impact of these designations upon mineral resource development.

7 4. Complete documentation and rationale for the evaluation of mineral potential of the WSAs and SMAs should be provided in order to verify accuracy and precision of mineral resource evaluations.

Mr. J. Darwin Snell
Page 3

STAFF ANALYSIS OF SPECIAL MANAGEMENT AREAS

8 In the California portion of the Yuma District there is significant acreage in Special Management Areas (SMAs), more than in Wilderness Study Areas, and therefore SMAs should be given special consideration. The following comments apply to Special Management Areas.

1. The mineral potential was not evaluated for SMAs. In the event Alternative E is recommended, SMAs will be withdrawn from mineral entry. This would have a significant negative impact on mineral resource development.

2. Minerals are not included under General Impacts for SMAs. Rules and restrictions in SMAs could have a significant negative impact on exploration and development in these areas.

3. The lack of an explanation of the rules and regulations for areas designated Outstanding Natural Area, Research Natural Area, Scenic Corridor, or Area of Critical Environmental Concern precludes accurate evaluation of impacts on mineral resources in these areas.

PREFERRED ALTERNATIVE AND ALTERNATIVES A THROUGH E

The comments in this section describe the expected impacts on mineral resources under each of the proposed management plans. The mineral potential of the WSAs and SMAs is also addressed.

PREFERRED ALTERNATIVE

Under the Preferred Alternative only the Chemehuevi/Needles WSA would be recommended for approval as wilderness in California. There are no known mines in the area on the California side of the District, but the area is within three miles of The Needles, a sizable gold mining district in Arizona.

If the area is designated as wilderness, mineral exploration and mining will not be allowed in this area.

Special Management Areas:

9 Under the Preferred Alternative, the Big Maria Special Management Area would be designated an Area of Critical Environmental Concern (ACEC). Page 14 states that this area

Mr. J. Darwin Snell
Page 4

9 would be withdrawn from mineral entry to protect cultural resources. On page 92 the BLM states that since this area is already withdrawn from mineral entry by the Bureau of Reclamation, new impacts are not anticipated. We recommend that no action to further withdraw this area from mineral entry be recommended until the mineral potential of the area is fully assessed.

10 The Whipple Mountains SMA will not be recommended for wilderness designation but will be managed to protect natural values. Depending upon the restrictions applied, this could have a significant impact on mineral exploration and development.

The Laguna-Martinez SMA is planned to be managed with a priority to wildlife habitat. A clear explanation of the land access regulations under this proposed management plan is needed to evaluate possible impacts on mining.

ALTERNATIVE A

Under Alternative A no areas in California would be recommended for designation as wilderness. It is unclear whether the areas under current withdrawal would be reopened to mineral exploration.

Special Management Areas:

Alternative A provides for the same management of the Whipple Mountains SMA as is described above under Preferred Alternative, and therefore our comments there apply here as well.

ALTERNATIVES B AND C

The Chemehuevi/Needles WSA would be recommended for designation as wilderness under Alternatives B and C (see Preferred Alternative).

Special Management Areas:

11 Under Alternative C the Whipple Mountains SMA would be managed according to the Preferred Alternative. The other California SMAs, Big Maria, Milpitas Wash and Laguna-Martinez would be managed to protect natural values. Depending on specific regulations and management practices, an adverse impact on mineral resource development may result.

Mr. J. Darwin Snell
Page 5

ALTERNATIVE D

Alternative D recommends for designation as wilderness the Chemehuevi/Needles WSA and parts of the Dead Mountains South, Whipple Mountains and Little Picacho Peak South WSAs.

Only 60 acres of the Dead Mountains South WSA would be recommended for designation as wilderness under Alternative D. The extremely small size of this area limits comment, and any impact on mineral resources may be negligible.

The Whipple Mountains WSA is described by the BLM as having moderate potential for minerals although these minerals are not identified. There are at least two small copper, silver and gold mines within one mile of the area. There are also numerous small mines, prospects, and mineral occurrences in the general area. Although only 535 acres are recommended for withdrawal under this alternative, the mineral development potential of the area may be significant. Withdrawal of this land from mineral entry could have significant impact on mineral development.

12 According to the Draft EIS, the Little Picacho Peak South WSA has a moderate potential for metallics and uranium. A few miles from the WSA gold and lead mines occur. Due to the lack of references, it is unclear where the information was obtained upon which the moderate potential for uranium was based. The data presented indicates that mineral development potential is limited; although mineral deposits may occur at depth. In light of available data, adverse impacts do not seem to be severe in this WSA.

Special Management Areas:

13 Under Alternative D, the Whipple Mountains SMA, the Big Maria SMA and the Laguna-Martinez SMA would be designated Areas of Critical Environmental Concern. In addition, the Milpitas Wash SMA would be designated an Outstanding Natural Area. Allowable uses in these areas would be limited to activities whose impacts could be mitigated to preserve or enhance recognized values. This stipulation, depending on the actual management guidelines, may cause increased exploration and mining costs in these areas and could prohibit mining in certain cases.

ALTERNATIVE E

Alternative E emphasizes non-consumptive use of resources. All eight California WSAs would be recommended for designation as wilderness. In addition all four California SMAs would be

Mr. J. Darwin Snell
Page 6

formally designated as wilderness under this plan. See Alternative D for comments on the Whipple Mountains and Little Picacho Peak South WSAs and the Preferred Alternative for comments on the Chemehuevi/Needles WSA.

The Dead Mountains North and South WSAs are classified as areas of low mineral resource potential by the BLM. Adverse impacts on mineral development are assumed to be minimal in these two areas.

The Chemehuevi Mountains WSA is small, less than 1/2 square mile in area and the mineral potential is classified by BLM as low. More data are required to determine the precise mineral potential of such a limited area.

The Big Maria Mountains North WSA covers an area of a little less than one section and is adjacent to a gold and copper bearing ridge. The Draft EIS indicates that the mineral potential of this area as moderate for metallic deposits. The surficial geology would not seem to support this designation, and without full documentation, comprehensive review is impossible. The mineralized area to the north may act as a source area for placer deposits in the WSA. The surficial units may be a source of sand and gravel, and gold and copper minerals may be present at depth. The withdrawal of this area from mineral entry may have adverse impacts on mineral exploration and development.

The mineral potential of the Big Maria Mountains South WSA is classified as moderate for metallics in the Draft EIS. Lack of documentation precludes detailed analysis, yet it seems unusual that this area is assigned the same mineral potential as the Whipple Mountains WSA, which is much more highly mineralized, and the geologic units of the Whipple Mountains WSA are also more favorable for mineral deposits.

Withdrawal of the Big Maria Mountains South WSA would have minimal adverse impacts on mineral resources potential of the District.

Special Management Areas:

14 Under Alternative B all California Special Management Areas would be withdrawn from mineral entry. The Draft EIS indicates that the BLM has not surveyed the mineral potential of these areas and has not addressed the impacts of withdrawal of these areas. The comments on the Big Maria SMA under the Preferred Alternative apply here (see above).

GENERAL REFERENCES
USED IN THIS REVIEW

Bishop, C.C., 1963, Needles Sheet: California Division of Mines and Geology Geologic Atlas of California, 1:250,000.

Burnett, J.L., 1985, Personal Communication, regarding geology and structure of The Needles, Arizona. California Division of Mines and Geology, staff geologist.

Jennings, C.W., 1967, Salton Sea Sheet: California Division of Mines and Geology Geologic Atlas of California, 1:250,000.

Morton, P.K., 1977, Mines and Mineral Resources of Imperial County, California: California Division of Mines and Geology County Report 7, 104 p. 1 plate.

Tucker, W.B., and Sampson, R.J., 1945, Mineral Resources of Riverside County: California Journal of Mines and Geology, v. 41, no. 3, p. 121-182, 1 plate.

Wright, L.W., Stewart, R.M., Gay, T.E., Jr., and Hazenbush, G.C., 1953, Mines and Mineral Deposits of San Bernardino County, California: California Journal of Mines and Geology, v. 49, nos. 1 & 2, p. 49-257, List of Mines, 1 plate.

Mr. J. Darwin Snell
Page 7

The Whipple Mountains SMA is the most highly mineralized area of the Yuma District in California. At least three small mines are present in the area and more are located within two miles of this SMA. These mines produced mostly gold and copper and some silver. There is also a small manganese mine in the area, with other mines and mineral occurrences to the north and south.

The withdrawal of these lands from mineral entry would have a significant adverse effect on the mineral resource development of the District.

The Milpitas Wash SMA is considered in the Draft EIS to be favorable for manganese, and possibly for gold. The withdrawal of this area from mineral entry would have a significant impact on mineral resource potential of the District.

The Laguna-Martinez SMA is host to gold and copper mineralization and one gold mine exists within the SMA. At least three other gold mines are present within one mile of the area boundary to the west. The alluvium near these deposits may contain placer gold. The Tertiary volcanic rocks are similar to the manganese bearing units to the north although no direct evidence of manganese mineralization has been recorded. The withdrawal of this area from mineral entry could have an adverse affect on the mineral resource potential of the District.

If you have questions regarding these comments please contact Robert Streitz, Division of Mines and Geology Environmental Review Officer, at (916) 322-3202.

Sincerely,

Dennis J. O'Bryant
Environmental Program Coordinator

cc: R. Streitz, DMG
R. Strand, DMG

807181

211

April 15, 1985

Planning Team Leader
U.S. DEPT. OF THE INTERIOR
Bureau of Land Management
Yuma District Office
P.O. Box 5680
Yuma, Arizona 85364-0697

Dear Sir:

Please include these written comments as part of your official hearing record on the Yuma District Resource Management Plan and Environmental Impact Statement. Thank you.

Federally administered land within the Colorado River floodplain should remain under federal control and development should not be allowed. As taxpayers, we are opposed to paying to bail people out of financial difficulties because they built in flood-prone areas. We are tired of poor government decisions letting people build in flood-prone areas. In recent Colorado River flooding, nearly all of the damaged property was in the river's natural floodway or within the 100-year floodplain. The best and cheapest flood control is to keep people and development out of floodplains and riverbottoms.

We are distressed that out of the 1,192,000 acres encompassed in the Yuma District planning area straddling the Lower Colorado River in southwest Arizona and southeast California, only 25,000 acres of wilderness riparian habitat have been recommended. This is completely inadequate for today and for the future. As relatively sparse as Arizona is today in population, the state's natural recreational areas are already receiving heavy public use. We who live in the Colorado River Basin and from our position of local knowledge greatly urge that the amount of wilderness riparian habitat be at least tripled. We will be cursed by our children's children if we leave them such a small amount of wilderness acreage along one of our country's major rivers, the mighty Colorado's western Arizona boundary.

Thank you.

Sarah K. Hepburn, 8462 Chaparral, Scottsdale Az. 85253
Joan M. Manly, 1533 W 7th St, Tempe Az. 85281
Ruth W. Smith 200 West Rd Phx Ariz 85041
Joyce Ward - 716 W. Broadway, Phx, AZ, 85041

Sarah K. Hepburn
8462 E. Chaparral
Scottsdale AZ 85253

Ruth W. Smith
200 West Road
Phoenix AZ 85041

Joan M. Manly
1533 W. 7th St.
Tempe AZ 85281

Joyce Ward
716 W. Broadway
Phoenix AZ 85041

212

YUMA COUNTY WATER USERS' ASSOCIATION
P. O. BOX 708 • N. 2ND AVE. AND CANAL • TELEPHONE 783-3188
YUMA, ARIZONA 85364

March 28, 1985

Planning Team Leader
Bureau of Land Management
Yuma District Office
P.O. Box 5680
Yuma, Arizona 85364-0697

Dear Sir:

Thank you for the opportunity to go on record as stating that the Yuma County Water Users' Association agrees with the Bureau of Land Management's preferred alternative in developing an "optimum multiple-use mix" for public lands in the Yuma District.

1 It was noted that any alternative chosen would not interfere with the operational requirements of the Colorado River water-shed area by the United States Bureau of Reclamation. We recommend that this criteria be considered to also include the operations of the Army Corp of Engineers, the International Boundary Water Commission, and others involved with water flow and ground water management.

2 We also noted a distinct void pertaining to disposal of Federal Lands within United States Bureau of Reclamation projects. Reference should be made to provisions of 43 USC 375 (b-f), 66 Stat 39 and a host of others dating back to the Reclamation Act of 1902 (Sections 5 and 6) pertaining to monies from the sale of Federal Lands within Reclamation Projects.

Sincerely yours,

Barrett Kell

Barrett Kell
Manager

BK:ih

BUREAU OF LAND MANAGEMENT
April 17, 1985
Page Two

However, there are three particular parcels of land which are not targeted for disposition which merit special attention and discussion. The three (3) parcels involved are Section 12, Range 22W, Township 20N; Section 30, Range 22W, Township 20N; and Section 10, Range 22W, Township 19N.

All three (3) of the identified parcels border the Colorado River, and provide the only remaining means and access for the general public to the river through recreation and public purpose reserved land. The remaining areas of undeveloped land are currently held by the State, and appear to be slated for intensive commercial/hotel-motel development.

It is imperative that the public access to the river, and to the recreation opportunities offered by the Colorado River, are preserved and protected by the Bureau of Land Management. The withdrawal of Sections 12, 30, and 10 for recreation and public purposes is an action that needs to be further solidified and supported by the current planning activities of the Yuma District.

1 The only concern that I have with the proposed plan is that it fails to specifically address the value of these three particular sections, and fails to outline any procedure which would be be taken to preserve the recreational nature of these parcels.

The purpose of these written comments as a follow-up to the oral comments given in the hearing in Lake Havasu is to stress the importance of preserving and maintaining the recreational nature of these parcels. It would be inappropriate and unfortunate if the Bureau were to allow these parcels of ground to be subject to any intensive hotel/motel or condominium type development.

Recreational uses of these areas envisions park usage, open desert areas, ballfields, public golf courses, public parks, and open unobstructed public access to beaches and riverfront. It would be unfortunate and inappropriate to allow any sort of permanent concession and/or structures to be placed on these parcels that was not readily available to large segments of the community at little or no cost.

It is these concerns that do not appear to be addressed in the current proposal for a Resource Management Plan, and I feel that it would be appropriate for these items to be addressed directly.

213

GEORGE F DAVIS CUMMINGS, ESQ.
P. O. Box 250
Bullhead City, Arizona 86430

April 17, 1985

DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT
YUMA DISTRICT OFFICE
P. O. Box 5680
Yuma, Arizona 85364-0697

ATTN: Mr. Dennis Turowski
Planning Coordinator

RE: DOCUMENT 1601 (YDO)

Gentlemen:

This letter is to provide a written comment to the draft Yuma District Resource Management Plan and Environmental Impact Statement which has been presented throughout the Yuma District Planning Area throughout the Spring of 1985. This letter is intended as a follow-up to the comments delivered by myself at the Public Hearing held in Lake Havasu on February 26, 1985, at the Nautical Inn.

As I stated at that time, I wish to express my general support and approval of the preferred alternative which was ably presented by Mr. Jim May. It appears as though the preferred alternative achieves the best balance between the diverse needs of the Planning Area, combining a balance of both developmental activities, as well as preservation and wilderness uses.

However, I wish to address specific comments as to the proposals in the vicinity of Bullhead City, Arizona. These are the areas that fall within Ranges 21 and 22W, GSRBM, and run from Township 19N, to 21N of the same Base and Meridian. The preferred alternative locates (on Map 9), a number of sections of land in this area that are targeted for disposition by the Bureau. Areas D6 and D7, totalling several thousand acres, are targeted for development and/or disposition. It is reasonable to assume, due to the rapid economic growth of the Bullhead City Area, that one or several of these sections will ultimately be disposed of to private parties, and will be intensely developed either in terms of a housing tract, condominiums, or commercial property. That use and disposition is appropriate, due to the general nature of the community, and to the type and quality of the land that is involved.

BUREAU OF LAND MANAGEMENT
April 17, 1985
Page Three

In closing, I would wish to take this opportunity to reiterate my additional comments made in Lake Havasu in reference to the outstanding quality of work that is being conducted by the Havasu Office of the Bureau of Land Management. Both Mr. May and Mr. Petersen have shown themselves to be able administrators, and outstanding stewards of the public trust that has been placed in them. In the course of my professional representation of both private development groups and public entities, I have had occasion to deal with both gentlemen on a regular and sustained basis, and I find that their qualifications and ability are of the first order, and I wish to take this opportunity to have my opinions of their high merit made a part of the record.

Sincerely,

GEORGE F DAVIS CUMMINGS

GFDC/jcy

214

UNITED STATES
DEPARTMENT OF THE INTERIOR
FISH AND WILDLIFE SERVICE
Kofa National Wildlife Refuge
P.O. Box 6290
Yuma, AZ 85364

April 17, 1985

RMP Team Leader
BLM Yuma District Office
P.O. Box 5680
Yuma, AZ 85364

I have reviewed the draft of the Yuma District Resource Management Plan (RMP) with particular interest in how the plan relates to Kofa National Wildlife Refuge. The U.S. Fish and Wildlife Service has a withdrawal application (A7950) which covers BLM's Wilderness Study Areas (WSA's) 5-31 and 5-33, and two sections (Sec.s 7 & 18, T.3N.,R.18W.) of LaPosa Long Term Visitor Area (LTVA 1). The Service is interested in having these areas withdrawn and added to the refuge. We would not want the RMP creating a conflict with our withdrawal application. The RMP should assure that there are no management conflicts should these areas be withdrawn and added to the refuge. 1

Designation of WSA 5-31 and WSA 5-33 as wilderness would be compatible with our withdrawal and wilderness proposal. Designation of Sections 7 & 18, T.3N., R.18W. as LTVA would not be compatible. This would conflict with refuge management if this area is added to Kofa NWR.

Map 8 shows Utility Corridor 8 (Palo Verde - Devers) leaving Yuma District and entering Kofa National Wildlife Refuge. Issue 5 (page 18) indicates this corridor could be utilized by new facilities. We feel utility corridors are not compatible with the purpose of the refuge and new facilities should not be permitted. There are facilities along this route at this time, however we feel it should not be designated as a utility corridor and request the RMP be changed to indicate this. 2

Thank you for the opportunity to comment on the RMP.

Sincerely,

Milton Haderlie

Milton Haderlie
Refuge Manager

MH/mfc

2 the RMP is developed it should include specific management prescriptions which specify how priority wildlife areas and special management areas will be managed.

The following comments are made with respect to the preferred alternative in Chapter 2, Alternative Including the Proposed RMP.

Wildlife Habitat

The recommendation of designating 25,000 acres of riparian habitat along the Colorado, Gila, and Bill Williams Rivers as priority wildlife areas appears to be an excellent idea. But, we are concerned as to what the long range management plans are for this acreage. Part of the 3880 acres along the Colorado River south of Yuma is now being considered for withdrawal to the Cocopah Indian Reservation. We are concerned with the apparent ease other agencies may be able to obtain priority wildlife areas. We wonder about the degree of protection BLM will provide to priority wildlife areas. 3

There is no mention of specific management for aquatic habitats of the Colorado, Gila, and Bill Williams Rivers. 4

We support the seasonal road closure within bighorn sheep lambing grounds. Managing bighorn sheep yearlong use areas (216,960 acres) and migration corridors (7,680 acres) as priority wildlife areas will probably assist in maintaining and enhancing bighorn sheep habitat in Arizona.

In conjunction with this management, we request that BLM retire the grazing rights on the Havasu Heights North and South allotments. These allotments are not grazed by livestock. These two allotments are important bighorn sheep use areas and provide ephemeral forage high in protein and other nutrients. They are also being considered for future transplant location. 5

BLM should identify and designate priority wildlife habitat areas for all special status species including the flat-tailed horned lizard, fringe-toed lizard, and desert tortoise. 6

Special Management Areas

We question why only two areas are recommended for designation as special management areas in the preferred alternative but six would be designated under the no action alternative. Why were not all six of these areas carried through to the preferred alternative? It appears as though BLM is abandoning the special management concept and is reluctant to protect unique natural values in the Yuma District. These special areas should be withdrawn from mineral entry, vehicle use should be restricted to designated roads and trails, and recreation development and grazing should be prohibited. These stipulations should also apply to the priority wildlife areas. 7

The 12 areas listed in Alternative D should be designated as special management areas. If BLM will not designate these special management areas, we ask reasons for failing to designate be provided. 8

215

THE WILDLIFE SOCIETY

Arizona Chapter
P.O. Box 11135
Phoenix, AZ 85017

April 15, 1985

J. Darwin Snell
District Manager
Bureau of Land Management
Yuma District
P.O. Box 5680
Yuma, Arizona 85364-0697

Dear Mr. Snell:

Thank you for providing us with a copy of the Draft Yuma District Resource Management Plan and Environmental Impact Statement.

We have reviewed this document and offer the following comments for your consideration.

Of the six alternatives presented, Alternative E or Resource Protection appears to provide the greatest benefits to the wildlife resource. However, certain recommendations in this alternative are probably not realistic. We support a combination of Alternative D, Balanced Protection, for grazing, land ownership adjustments, communication sites and recreation, and Alternative E for the remaining issues and subissues.

As previously stated, Alternative E appears to provide the greatest benefits to the wildlife resource. Unfortunately, these benefits may be minimal. To develop a successful resource management plan that provides for multiple use and sustained yield of resources, an inventory of these resources and their status must be completed before the planning process is initiated. From the minimal information provided in the draft RMP-EIS, on wildlife resources it appears as though such a wildlife inventory has not been completed on the Yuma District. We question how BLM can develop a resource management plan to provide for sustained yield of wildlife resources, and describe impacts from implementation of this plan when the location and status of most wildlife species in the Yuma District is not presented or known. Therefore, BLM should conduct an inventory of wildlife resources on Yuma District lands, determine their status, and based on this information, develop a management plan for wildlife resources to provide for sustained yield. When 1

Grazing Management

We recommend that grazing of domestic livestock on the Cactus and La Posa Plains be eliminated because of their unique natural value and resulting adverse impacts from grazing (page 84). No new developments should be allowed in these two areas with the exception of fencing to prevent livestock from entering the area from nearby allotments. Both the Cactus and La Posa Plains are fragile and unique communities. Their sand dunes are stabilized by big galleta grass and mormon tea. If livestock are allowed to graze and trail in these areas, they could easily disrupt and overuse this sensitive community. Both the La Posa and Cactus Plains may be designated as special management areas and Cactus Plain will be recommended for wilderness designation.

Authorized use should be limited to perennial-vegetation management. No seasonal or ephemeral permits for grazing should be allowed until BLM is able to show that such grazing does not adversely impact the wildlife resource.

Land Ownership Adjustments

We support the concept of blocking up federal lands through exchange. However, most of the areas identified for acquisition are away from the Colorado River. We recommend that BLM concentrate on acquiring land along the river for riparian protection and revegetation efforts. These areas should be closed to recreation development, long-time visitor use, grazing, and mineral entry. 9

We recommend that all agricultural areas not leased or that have leases cancelled and are within the floodplain be revegetated with native riparian species for use as wildlife habitat.

Recreation

We support BLM's regulations to control length of stay and wood collecting.

BLM needs to enforce its length of stay regulations, long-term visitor area, off-road vehicle use and wood collection regulations. Please inform us as to how BLM intends to enforce these regulations. 10

In addition, future recreation planning and associated impacts should be analyzed in a comprehensive document for public review which analyzes the cummulative impacts of these recreation developments. 11

We do not support the designation of ORV use to existing roads and trails. Because of the fragile surface of the desert, a single pass across the desert will result in an existing trail. Such unauthorized activity will eventually result in loss of wildlife and wildlife habitat. We question how BLM will be able to distinguish between authorized existing roads and trails and unauthorized ones and how this ORV designation will be enforced. From a management standpoint, it would be easier to enforce an ORV designation of use of designated roads and trails and post those roads and trails that are open. What is BLM's definition of existing roads and trails? Some washes are passable to vehicles but use of washes by vehicles should be prohibited because of negative impacts on wildlife. Additionally, because of the fragile 12

12 nature of the Cactus and La Posa Plains and South Yuma Desert, these areas should be closed to all vehicular access except on designated roads.

13 The Parker 400 ORV competitive use course should be eliminated. Part of this course is adjacent to an area recommended for wilderness. Additionally, no mitigation is described to compensate for the loss of wildlife resources.

Wilderness

All WSA's listed under Alternative D should be designated as wilderness.

14 In Chapter 4, Environmental Consequences, only general impacts on wildlife resources are described for each of the six alternatives. Because data on wildlife resource status is limited, BLM could only provide a cursory examination of potential impacts from implementation of the alternatives. When sufficient data are lacking to accurately describe the impacts of described alternatives, the regulations which implement the National Environmental Policy Act state that a worst case analysis must be provided in the environmental consequences section. BLM has not complied with these regulations in the draft RMP-EIS. Therefore this chapter should be rewritten to provide a worst case analysis of impacts to the wildlife resource. Such an analysis should include estimated number of acres per vegetation type impacted and estimated loss or gain of numbers of animals for special status species.

Appendix A

15 No monitoring plan is included in the draft EIS-RMP. If such a plan will not be developed until the final EIS or Record of Decision are published, the public will not have the opportunity to comment on a crucial part of the resource management plan that should have been included as part of Chapter 2 of the draft RMP-EIS. We wish to comment on the monitoring plan including the intervals and standards for this plan, and we believe that the public should be permitted to comment as well.

Because of the lack of wildlife inventory data, omission of a detailed monitoring plan, and noncompliance with NEPA regulations requiring a worst case analysis, a supplemental draft RMP-EIS should be developed and released for public review and comment prior to issuance of the final RMP-EIS.

Appendix E

16 Several of the species and their listing status in the appendix are incorrect. We suggest you consult with the state game and fish agencies and U. S. Fish and Wildlife Service for current information on species status.

4

Thank you again for the opportunity to review this environmental document. We hope our suggestions will aid in making this a better environmental impact statement and resource management plan.

Sincerely,

W. G. Kepner
President-Elect

cc: State Director, BLM, ASO

5

216

ARIZONA DESERT BIGHORN SHEEP SOCIETY INC.

P. O. Box 5241 • Phoenix, Arizona 85010

April 16, 1985

Mr. J. Darwin Snell, District Manager
Yuma District
Bureau of Land Management
P. O. Box 5680
Yuma, Arizona 85364-0697

Dear Mr. Snell:

The Arizona Desert Bighorn Sheep Society, Inc. wishes to make the following comments regarding the Draft Yuma District Resource Management Plan and Environmental Impact Statement. Please include our comments as part of the official review record.

We support the Preferred Alternative.

1 In the Preferred Alternative the Wildlife Habitat issue, under Bighorn Sheep Use Areas, states roads traversing bighorn sheep lambing grounds would be closed during the lambing season from January 1 to June 30 except for emergency access or access relating to certain valid existing uses. These dates coincide with the Society's waterhole construction season. We have worked with your District personnel in the past in the development of sheep waters on the Yuma District. Nowhere is valid existing use defined in the RMP/EIS. The Society requests our construction and maintenance activities of desert bighorn sheep waterholes and associated facilities be included as a valid existing use, and therefore grounds for exemption from the road closure.

2 Also in the Preferred Alternative, the Right of Way issue speaks to the designation of nine existing and proposed rights-of-way as utility corridors. Even though future development would be linked to these corridors we insist planning for construction of individual powerlines be done so as to lessen the impact on desert bighorn at critical times, such as lambing.

Thank you for the opportunity to comment on this draft plan. The Arizona Desert Bighorn Sheep Society, Inc. feels the Preferred Alternative, if properly implemented and funded, will benefit the long term welfare of the desert bighorn sheep on the Yuma District.

Yours in Conservation,

Stephen M. Williams
Legislative Chairman

cc: Dean Bibles, State Director

218

Department of Energy
Western Area Power Administration
Boulder City Area Office
P.O. Box 200
Boulder City, NV 89005

APR 16 1985

Refer To: G1010

District Manager
ATTN: Planning Team Leader
Bureau of Land Management
Yuma District Office
P.O. Box 5680
Yuma, Arizona 85364-0697

Dear Sir:

We appreciate the opportunity to review the draft Yuma District Resource Management Plan and Environmental Impact Statement. Western's directive to meet public demand for Federal power using Federal transmission lines will best be met by close coordination between our agencies. Our comments regarding your document are as follows:

* Western agrees with protecting the resources of an area. We think an approach for a mix of natural and commercial resource uses while minimizing disruption of the human environment is the best approach to resource management.

1 * Therefore, Western is agreeable to the corridor concept of utility sitings. We notice that your preferred alternative (Map 8) does not provide corridors where several Western transmission lines are existing. Since your office is not providing appropriate corridors, Western cannot support your preferred alternative or any of the other alternatives as presented in the DRMP/EIS.

2 * Experience has shown that corridors of only 1 mile in width, down to 333 feet in some areas, are too restrictive for proper planning and siting of transmission lines. The state of the art corridor widths are from 3 to 5 miles. The proposed restrictive 1 mile wide corridors force impacts to resource which could be avoided by the appropriate width corridors. In addition, the National Electrical Safety Code dictates proper spacing of transmission lines. Forcing transmission lines close together causes many technical problems which increase costs and threatens the reliability of the system. Due to the rapid population growth in the Southwest, Western along with other utilities will be required to provide power including Federal power that is available to these customers thus the need for future transmission lines.

3 * Map 8 only indicates existing communication sites. By implication no new sites will be allowed in the resource management area. This is too restrictive. Communication sites are chosen based on paths of direct line of sight. Any physical blockage of this line of sight forces new paths. Western will use the existing sites whenever possible but technical requirement directs that flexability must be allowed for Western to meet its directives. Sites have to be selected for non-interference (line of sight) from new facilities to the best vantage point for the system.

LTR TO PLANNING TEAM LEADER - BLM CONTD 2

Our conclusion is that your proposals are too restrictive for proper administration. If your office would adjust the corridor widths to 3 to 5 miles wide, allow for proper technical siting of communication sites, and include all Western's existing transmission lines in corridors then Western could support your preferred alternative.

Sincerely,

G. J. Giles
Assistant Area Manager
for Management Services

cc: Gary Frey (A0420)
Environmental Manager
Western Area Power Administration
Golden, CO

3 Sensitive wildlife species and their habitat when considering proposed actions or projects which may affect such species. I am glad to see that Yuma clapper rail habitat will be protected under all alternatives.

Overall, the RMP/EIS document is well prepared and presented. I have no further comments concerning the plan.

Sincerely,

Claire S. Caldes

Claire S. Caldes
Assistant Refuge Manager

219

UNITED STATES
DEPARTMENT OF THE INTERIOR
FISH AND WILDLIFE SERVICE
IMPERIAL NATIONAL WILDLIFE REFUGE
P.O. BOX 72217
MARTINEZ LAKE, ARIZONA 85365
April 17, 1985

Bureau of Land Management
Yuma District Office
P.O. Box 5680
Yuma, Arizona 85364-0697

Attn: Draft RMP/EIS Planning Team Leader

Thank you for the opportunity to review and comment on the draft Resource Management Plan and Environmental Impact Statement for the Yuma District planning area. Areas administered by BLM which have potential impact on Imperial National Wildlife Refuge are the South Trigo Mountains and the Trigo Mountain Wilderness Study Areas (WSA). Under the preferred alternative, these two WSA's would be recommended as unsuitable for wilderness designation, but would be managed as priority wildlife habitat. Since units 5, 3 and 4 of the proposed Imperial National Wildlife Refuge Wilderness adjoin the South Trigo and Trigo Mountain WSA, the refuge prefers that these WSA's be recommended for wilderness designation. These areas offer opportunities for solitude and primitive recreation when considered part of the proposed wilderness area in Imperial Refuge. It would result in uniform management between the two Federally owned land sections. By recommending wilderness designation for these WSA's, long term protection to these areas would also be provided.

1 Managing these WSA's as priority wildlife habitat areas (under the preferred alternative) is acceptable to Imperial NWR. ORV activities would be permitted in these areas and be restricted to "existing roads and trails." The RMP/EIS should define "existing roads and trails" in some manner to limit newly developed roads and trails which are being created daily across the desert. One trip across the desert pavement in a vehicle will leave scars which remain for years. Is this now considered an existing road??

2 The RMP/EIS should discuss how it plans to monitor grazing and the
3 mitigation process addressing grazing. Emphasis should be placed on State-listed, as well as Federally-listed, Threatened, Endangered and

220

San Diego Gas & Electric

RECEIVED
BLM DISTRICT
APR 19 5 5 AM '85
YUMA, ARIZONA

April 16, 1985

FILE NO --

Mr. J. Darwin Snell
Bureau of Land Management
Yuma District Office
P.O. Box 5680
Yuma, AZ 85364-0697

Dear Mr. Snell:

Thank you for the copy of the Draft Resource Management Plan and Environmental Impact Statement for the Yuma District Planning area. You requested that we review the draft and provide you with our comments by April 19, 1985.

We have no comments regarding the text of the plan except to say that it appears to be a well-balanced approach to the management of the public lands in the Yuma District.

However, we do suggest that the following changes be made to Maps 8 and 9 of the plan:

1
- o Map 8 does not show the Southwest Powerlink 500 kV transmission line located on the north boundary of the Quechan Indian Reservation. Survey Drawing T-2000-6 is hereby provided for that purpose.
- o Map 9 shows the accretion land withdrawn and in public ownership. As you recall, we purchased fee title to the accretion lands pursuant to Patent 04-85-0039 (copy attached). A change showing this ownership should be made.

Again, thank you for the opportunity to comment. If you have any questions regarding our comments, please call me at (619) 696-2415.

Sincerely,

J. C. Barnett
Licensing Analyst

JCB:mcm

Attachment

POST OFFICE BOX 1831 • SAN DIEGO, CALIFORNIA 92112 • TELEPHONE: 619/696-2000

221

Box 475
Somerton, Az.
85350

April 16, 1985

Bureau of Land Management
Yuma District Office
P.O. Box 5680
Yuma, Az.

Dear Mr. Snell:

I would like to offer the following comments on the Resource Management Plan in the area of off-road vehicles.

The category"existing roads and trails with seasonal closings" has the same per cent of acreage in the Preferred and Alternative D, ninety-five per cent.. The category "designated roads and trails" has also the same per cent of acreage in both plans, one per cent. I suggest that these per cent figures and the number of acres in each category be interchanged so that the main portion of lands be limited to designated roads and trails rather than existing roads and trails.

1 "Existing roads and trails" is a nebulous term and is not defined in the glossary. It seems that all it would take to create an existing trail is for someone to drive on it.Existing trails are constantly being obliterated in these areas by blowing sand. "Designated" is a much more concise definable term. As far as the alternatives are presently stated, the only satisfactory alternative seems to be alternative E as in this alternative seventy-seven per cent of acres are designated roads and trails.

The "off" of off road vehicles should be eliminated and all vehicles on federal lands should be driven on designated roads or trails except in an emergency situation. The desert ecology is too fragile to be driven over indiscriminently. Trails made in certain areas bW vehicles tend to remain indefinitely. These areas are the home of the Desert Tortoise, Gila Monster, Flat-Tailed Horned Lizard, and Fringed-toed Lizard, all threatened or in Group IV. Vehicles driven for recreational purposes should be limited to designated roads and trails.

The number of acres as closed areas is surprisingly low. When these are stated in per cent of total acreage, alternatives Preferred, A, and D have only two per cent closed totally. Alternative E has only twenty-one per cent closed which seems to be inconsistent with its protection philosophy.

I realize that probably nothing can be done about eliminating the two competitive areas, Parker 400 and Ehrenberg Sand Bowl. But more careful regulation of its use, and more distinct marking of its boundaries so that there is no possibility of vehicles straying into adjoining areas. Please keep this as it is, less than one per cent of all O.R.V. acreage.

I urge the Yuma office of B.L.M. to try to increase their staff numbers so that monitoring of all B.L.M. areas is a possibility. Please inform me of any time I can write a letter to officials or to my congressmen when B.L.M. funding is an issue. A letter at the right time stating that I feel that B.L.M. funding should be increased instead of decreased and giving reasons why is only effective if it comes at the right time.

Thank you for considering my comments.

Kathryn Michel

Kathryn A. Michel

222

835 E. Orange Grove Rd.
Tucson, Arizona 85718

April 14, 1985

J. Darwin Snell, District Manager
Bureau Of Land Management
Yuma District Office
Post Office Box 5680
Yuma, Arizona 85364-0697

RE: Yuma District (RMP/EIS)

Dear Mr. Snell:

This desert of southwestern Arizona contains a rich and interesting region of low rugged and picturesque mountains with broad valleys. The harsh impact of man can be noted through much of the area.

I would like to encourage you to give environmental protection through Alternative E - Resource Protection. This is especially important regarding natural riparian areas. It is a national disgrace the manner and result in which the Colorado River has lost its natural qualities as a river.

As the west continues to expand, areas such as these which have wilderness or riparian potential will shrink and cease to exist completely. It is only through protection that the natural character of the land will remain for future generations to enjoy.

Sincerely,

Dan Fischer

Dan Fischer

223

Wildlife Management Institute

Suite 725, 1101 14th Street, N.W., Washington, D.C. 20005 • 202/371-1808

DANIEL A. POOLE
President
L. R. JAHN
Vice-President
L. L. WILLIAMSON
Secretary
WESLEY M. DIXON, Jr.
Board Chairman

April 15, 1985

Planning Team Leader
Bureau of Land Management
Yuma District Office
P.O. Box 5680
Yuma, Arizona 85364

Dear Sir:

The Wildlife Management Institute is pleased to comment on DRAFT YUMA DISTRICT RESOURCE MANAGEMENT PLAN and ENVIRONMENTAL IMPACT STATEMENT.

The plan and impacts are well organized and stated. Wildlife is recognized as a major resource.

We prefer Alternative E, but believe some relaxation of the severe restrictions on recreation concessionaires would be in order.

A principal reason for our preference of Alternative "E" over the preferred alternative is that "E" eliminates livestock grazing. This will be good for almost all other resources.

There are only 333 cattle involved, less than 1 percent of the forage in the three-county small livestock industry. There are four permanent year long allotments on 366,660 acres - it takes 91 acres to feed a cow for one month. There are already 84 range improvements constructed, 80 for cattle, 4 for wildlife (Appendix G). There are 2 miles of pipeline, one well and one trough proposed for the two "Improvement" allotments.

An AUM is worth $8.85, (page 76). The government charges $1.35, a small, but outrageous subsidy.

On page 131, elimination of grazing is shown to have very positive effects, and on page 77 it is stated that $19.9 million is spent in the area each year as a result of recreation.

Economics alone tells us that grazing is not only costly, but detrimental to the riparian and desert habitats that attract recreationists.

We have seldom seen such clear-cut reasons for removing a small damaging livestock use to benefit the broad public good.

DEDICATED TO WILDLIFE SINCE 1911

-2-

These remarks have been coordinated with William B. Morse, the Institute's Western Representative.

Sincerely,

Daniel A. Poole
President

DAP:sh

225

April 17, 1985

Planning Team Leader
Bureau of Land Management
P.O. Box 5680
Yuma Az 85364

Dear Sirs,

Myself and an associate, John Pechous, are currently working with the Tonto National Forest and other agencies in Arizona to develope a concept with respect to public recreational land use. It is our understanding that you are now in the process of developing a resource management plan and are accepting public input. We are both currently Marketing Program Managers for U-Haul International and are responsible for U-Haul's nationwide recreational rental program. The management of nearly ten thousand rental units including ATVs, Jet Skis, Surf Jets, fishing boats and camping equipment has created an awareness of the problems posed by the rapidly increasing numbers of small recreational units in the United States.

National Forest, BLM and other public properties become the obvious playgrounds for users of ATVs, four-wheel drive vehicles and various types of watercraft. The fact that every undeveloped piece of land and every body of water provides potential as a recreational use area, leads to some interesting management and enforcement problems for public agencies. The State of California currently has over forty pending lawsuits involving small recreational units. A good number of these involved units were rented.

We believe that an on-site rental concession concept is consistent with the safety and management objectives of these public agencies. A concessionaire has a much greater chance of controlling the behavior of his customers and use of the equipment than a business which rents this type of equipment from a metropolitan location. The private sector should be permitted and required to be involved in the on-site management process of people using rented units as they are profiting from the use of these units on public land.

From a common sense point of view, this type of management can only be effective if the potential area for use of these items is restricted. We are thus proposing that "designated use areas" be established particularly for land use vehicles to make it physically possible for effective management to occur. Control and policing of renters, reaction time to injuries and environmental impact could be reduced if such a program were adopted.

Simply stated, a concession operation located adjacent to a designated use area would be:

(1)

224

RIVER DEVELOPMENT ASSOCIATION
P. O. BOX 8
PARKER DAM, CALIF. 92267

April 14, 1985

Mr. Darwin Snell
Planning Team Leader
Bureau of Land Management
P. O. Box 5680
Yuma, Arizona 85364-0697

Dear Mr. Snell,

During a recent meeting of the River Development Association held on March 28, 1985, all the members of our association wish to go on record as supporting the "Preferred Alternative Plan" of the Yuma District Resource Management Plan.

We would like to take this opportunity to thank you and your staff for our on-going working relationship to develop our particular Bureau of Land Management Concessions to their highest potentials.

Sincerely,

Phil Kounis
President

1. More economically managed by government agencies if the private sector was allowed to contribute in the management of these areas.

2. Better maintained, cleaner and would result in less determental impact to the environment through improved control.

3. Safer for both users and bystanders through better safety and use instructions, policing, creating a directional flow of traffic and removal of natural hazards.

4. Cause the private sector to assume a more responsible role in the control and instruction of customers than is currently the case in an off-site rental operation.

In the future we would be pleased to be involved in whatever way you deem as appropriate in your planning process. Please keep us informed of public hearings, etc, with respect to this issue. Thank you for your consideration.

Regards

Steve Nelson	and	John Pechous
846-0235 (H)		899-1755 (H)
263-6841 (W)		263-6818 (W)

dba: Sun Country Recreational Rentals

confirming conversation: Dennis Turowski

cc: Dennis Turowski

(2)

226

April 12, 1985

Mr. Alan Belt
District Office of the BLM
P.O. Box 5680
Yuma, AZ 85364

Dear Mr. Belt:

An article appeared in The Yuma Daily Sun on Feb. 27th and stated that you would receive comments from citizens concerning development of the Colorado River land use plan. My comments are as follows:

I can think of no other single project that would stimulate the economy of this community like the development of the river. The recreational potential is unlimited. Millions of dollars from tourism would flow into the community and local folks wouldn't have to go all the way to Lake Martinez to do a little boating.

I realize there are wildlife and agricultural interests that must be protected, but feel strongly that the recreational potential of the river can be realized without hurting either.

Sincerely,

Jeff D. Dorroh
2617 Augusta Dr.
Yuma, AZ 85364

227

PETITION

Letter 227 was a handwritten petition bearing 46 signatures and the following statement. The statement has been typed verbatim by BLM for better reproduction and ease of reading in this EIS.

Planning Team Leader, BLM, Yuma Office:

We would like to urge that areas NA-8 (5-14A/B Cactus Plain) and 5-23A and 5-23B of Map 7 of 1984 Resource Management Plan remain open for mineral prospecting and entry for new mineral claims.

228

YUMA AUDUBON SOCIETY
P.O. Box 6395
YUMA, ARIZONA 85364

April 19, 1985

J. Darwin Snell, District Manager
Yuma District Office
U.S. Bureau of Land Management
P.O. Box 5680
Yuma, Arizona 85364-0697

Dear Mr. Snell:

The following are Yuma Audubon's comments on the Draft Yuma District Resource Management Plan and Environmental Impact Statement of January, 1985. We appreciate the opportunity to comment on this major document which will govern public land use over 200 miles of land adjacent to the Colorado River. Accordingly, we have reviewed the document in detail and submit extensive comments.

This document is just a beginning, as you well know. We look forward to working with your office in implemeting this plan, including development of a monitoring plan and site-specific plans, such as for wilderness areas and Areas of Critical Environmental Concern.

WILDLIFE HABITAT

1 We believe that "discourage" (p. 7, EIS) is not strong enough language in reference to the introduction of exotic species. "Prevent" is more appropriate.

2 On p. 13 of the EIS, the definition of "priority wildlife habitat" is a bit confusing. In the third sentence of the "ISSUE 1: Wildlife Habitat" paragraph it is stated that the only activities which would be allowed in priority wildlife areas would be those that can be mitigated in such a way that wildlife values are preserved or enhanced. But in the next line improvements required by mining are categorically permitted, apparently without regard for impacts to wildlife habitat. This same language appears on p. 14 in reference to 33 cultural resource sites. We object strongly to this blank check approach to managing mineral resources in supposedly priority wildlife and cultural resource areas. In addition, BLM does not have the authority to grant a blank check to miners; there may be situations in which mining activities would necessarily be curtailed due to resource protection language in the National Environmental Policy Act, California Environmental Quality Act,

Page 1

Endangered Species Act, and National Historic Preservation Act.

2 Due to the high level of impact often associated with mining activities, we strongly recommend mineral withdrawl of all priority wildlife habitat.

3 It is also stated on p. 13 of the EIS that roads accessing utility corridors and facilities would be closed in priority wildlife habitat. We support this policy, but in reality, how will BLM close these roads, and then how would the closures be enforced?

4 Also, what is an "existing" road or trail? We strongly recommend a route designation process, such as that employed by the California Desert District of BLM. Since an "existing" trail can often be established by one vehicle travelling off-road once, existing roads and trails need to be defined very specifically, such as in reference to some map.

Because human activity at watering holes can preclude wildlife use, we recommend adoption of a policy of no camping within a quarter mile of springs.

5 In general, we are pleased to see riparian woodlands and Bighorn Sheep receiving special attention, but other species and habitats deserve attention as well. We are especially concerned about the management of state-listed species habitat. No consultation procedures or mitigation is legally required for these species, making it doubly important that they be discussed thoroughly in an EIS.

We particularly recommend that the habitats of the Flat-tailed Horned Lizard (Phrynosoma m'callii) and Fringe-toed Lizard (Uma notata rufopunctata) be designated priority wildlife habitat. Furthermore, we believe crucial or high density Gila Monster and Desert Tortoise habitat should be designated priority wildlife habitat as well. Other state-listed species will generally be protected by priority wildlife designation in riparian woodlands, but only if wildlife in those areas really receives priority.

6 On p. 72, it should be mentioned that the Yuma Puma (Felis concolor browni) is a candidate for the Federal list of threatened and endangered species.

7 General impacts on wildlife (p. 87, EIS): Long-term benefits described here are contingent upon a low level of mining activity. See also p. 97, last paragraph. Also, the Yuma Clapper Rail (Rallus longirostris yumanensis) is an endangered species--meaning there are significant threats to the animal. Merely sustaining its population is not enough. We support management to restore and enhance Yuma Clapper Rail habitat and increase the population of this subspecies so it may some time

Page 2

7 in the future be considered no longer endanegered.

8 On p. 98, impacts from minerals and energy activities need to be discussed. This is true for the other alternatives as well. As mentioned above, mining could be a serious impact to wildlife habitat, even in priority habitat areas.

9 The wildlife mitigation section on p. 135 needs to be expanded considerably. Mitigation policy needs to be established for impacts from recreational development, mining, energy development, grazing, and other activities. The level of mitigation should be quantified as well. We recommend mitigation at more than 75% of lost habitat units.

10 On p. 248, Appendix E, it should be noted that the Flat-tailed Horned Lizard and Fringe-toed Lizard are both Group 3 Arizona listed species and Category 2 candidate species for the Federal list. On pp. 249 and 250, Appendix F, the source (BLM 1984) given for these species lists is not cited in the refernces section.

GRAZING

We recommend a number of changes in the Preferred Alternative grazing element.

11 Ephemeral allotments. The EIS does not discuss the effect of ephemeral grazing on wildlife. For example, how does cattle grazing impact Desert Tortoises who also rely on ephemeral plants? Why doesn't BLM allocate forage for Desert Tortoises? Nothing is presented on vegetative condition and apparent trend in condition for the ephemeral allotments in the Yuma District. What role does variation in vegetation play in the ecology of wildlife in the Yuma District? Research by Danita Hardy of the University of Arizona indicates that green vegetation but not water is a limiting factor in reproduction of Round-tailed Ground Squirrels (Journal of the Arizona-Nevada Academy of Science, Proceedings Supplement, p. 25, 1985).

Given all these unknowns, we recommend that ephemeral livestock grazing be eliminated from the Yuma District. Some of these ephemeral allotments have not even been used for a number of years, such as Lake Havasu North and Lake Havasu South (EIS, p. 198). Not only could wildlife utilize this vegetation for food and cover, but it would also prevent soil erosion and provide humus in an environment where humus is scarce (see Wallace H. Fuller, Soils of the Desert Southwest, Tucson: University of Arizona Press, pp. 40-41).

Perennial-ephemeral Allotments. We also recommend that increases for ephemeral grazing be eliminated on perennial-ephemeral (P-E) allotments for the reasons mentioned above. We also feel that more needs to be done to improve the condition of the

environment on the P-E allotments than is proposed in the Preferred Alternative.

12 The Muse allotment should be retired from grazing. No use for this purpose has occurred in 5 years, yet 45% of this allotment is still in only fair or poor condition. We disagree with BLM's proposal to put this allotment in the Maintain class--this implies there are no serious resource use conflicts and there will be no change in grazing practices, although we do agree that there should be no change in the grazing practices of the last 5 years since this allotment has gone ungrazed. The Muse allotment includes parts of the Cactus Plain and East Cactus Plain WSAs and these unique habitats should be protected from disturbance.

13 We agree that the condition of the Nine-Mile and Ganado allotments needs to be improved, but not by expanding grazing. Under BLM's proposed action, only 65% of these allotments would be improved to good to excellent condition. This means 35% of these areas would have less than 50% of their potential vegetation. The Ganado allotment in particular needs improving, with 40% of the area in poor to fair condition and most of this in static or even downward trend. Dispersing the cattle into the Cactus Plain wilderness would not be an improvement, but rather than opposite, and we recommend that cattle be kept out of the fragile Cactus Plain and East Cactus Plain WSAs. BLM's improvement plan is a no-win situation--either allow continued overgrazing in Osborne Wash, or disperse the cattle and allow grazing on previously ungrazed areas of the Cactus and La Posa Plains.

14 The Bishop allotment certainly needs more than just "custodial" management. 36% of it is in poor to fair condition, none of it is in excellent condition, and its trend is 100% static. This is clearly undesirable.

Given the generally poor quality of the vegetation in these allotments, along with the fact that it takes over 900 acres to support one cow, we question the economic and ecological viability of trying to support large, exotic herbivores in the driest desert of the United States when there were no functional equivalents of cattle under pre-European contact conditions (at least not since the Pleistocene, when the climate and vegetation were different). We believe that BLM's planning goal should be to return all allotments to excellent condition as soon as possible, including through the elimination or at the least, reduction of grazing.

SPECIAL MANAGEMENT AREAS

We feel all fifteen Special Management Areas are worthy of designation as Areas of Critical Environmental Concern (ACEC). It is ironic that the 1975 Yuma District Management Framework

Plan would protect more areas and more acres with special management designation (Preferred Alternative: 31,360 acres, 2 areas; Alternative A: 52,040 acres, 4 areas; see Table 2-1, p. 15).

We also note that while on p. 3 of the EIS Special Management Area designations are seen as "restrictive" they could also be viewed as "protective."

15 We feel that BLM should have resurveyed the district to determine whether there are areas that merit ACEC designation. The areas in this plan were apparently identified in the 1975 MFP (p. 60) which predates FLPMA. Since FLPMA clearly mandates priority consideration be given to ACECs (it is now 9 years since FLPMA became law), a new survey should have been made. Perhaps this also explains why there were so few potential (not to mention recommended) ACECs in the EIS.

BLM's own descriptions of these Spcial Management Areas are the best recommendation for designation.

--> CROSSMAN PEAK includes some areas outside the WSA which we recommend for wilderness. It has unusual plants and animals, including the Singleaf Pinyon (Pinus monophylla). This is clearly of more than local significance because the extremes of distribution of plants and animals and relict populations can provide important data to scientists seeking to understand plant distribution and classification, climates, and evolution. The three reptiles of special concern also give this area more than local interest, special worth, and concern. The cultural values, sacredness to the Mohave people, also lend this area more than local significance, special worth, meaning, distinctiveness, and a cause for concern that these spiritual values could be violated if the area is not protected from mining and vehicular incursion. Finally, since Bighorn Sheep are greatly sought by watchers of wildlife and hunters, again this area is of more than local concern. It has cultural, scenic, and fish and wildlife values and exhibits other natural systems and processes, all of more than local concern (see 43 CFR 1702(a), 1610.7-2). We agree with BLM's recommendation to designate Crossman Peak a Special Management Area, but it should be an ACEC, not just a Natural Scenic Area, which means so much less than ACEC designation.

--> AUBREY HILLS should also be an ACEC. Many people driving from Parker to Lake Havasu City pass by this area and admire its scenic values. Thes people come from all over Arizona, southern California, and during the winter, the northern United States and Canada. It is a needed contrast to the intensive development of the Parker Strip and Lake Havasu City. There are also fish and wildlife values in that Bighorn Sheep are present. The boundary also goes down to the Colorado River and would help
16 preserve naturalness along the river. Are there any Yuma Clapper

16 Rails along the river in this area? If so, an ACEC would also serve to protect them. The Yuma Clapper Rail is a Federally endangered species and is thus of more than local interest.

--> WHIPPLE MOUNTAINS is a unique area and we find it hard to understand how BLM could neglect recommending it for ACEC status. It has tremendous value as a natural system with its "Arizona" vegetation in California, including Saguaro and Foothill Palo Verde. It is another area where plants are at the extremes of their ranges and for this reason is of great scientific interest. Also of scientific interest are the woodrat middens which help in reconstructing past climatic and vegetation history. Cultural values are also important in the Whipple Mountains with many archaeological sites and sacred meaning to the Yuman Indians. Add to this Desert Bighorn Sheep and an area that extends to the Colorado River, where there may be Yuma Clapper Rails, and this is one of the most worthy areas for designation as an ACEC. Its national significance is also attsted to by inclusion in THE SIERRA CLUB GUIDE TO THE NATURAL AREAS OF CALIFORNIA by John Perry and Jane Greverus Perry (San Francisco: Sierra Club Books, 1983).

--> THE MESA has by BLM's judgment "some of the most outstanding scenic features in the Havasu Resource Area" (EIS, p. 61). This area is truly exceptional to be outstanding among already outstanding areas. It is highly scenic, looming above the Bill Williams River (which has attracted the attention of The Nature Conservancy), and contains a Bighorn Sheep lambing area. The Buckskin Mountain Bighorn Sheep have been seriously impacted by denial of access to the Colorado River because of development of the area, and ACEC status for The Mesa would help them. The Mesa was at least recommended for Outstanding Natural Area status in the 1975 MFP and BLM hasn't shown why this recommendation should be changed now.

--> GIBRALTAR MOUNTAINS is an area where BLM should acquire the split estate and make this Special Management Area part of the Gibraltar wilderness. See our comments under wilderness.

--> BANDED CANYON is another example of an area with such significant values that we find it hard to understand why it is not recommended as an ACEC. It has already been recommended as a National Natural Landmark, showing it is of more than local significance. It has great scenic value, illustrates geological and riparian systems and processes, and is a transition between two desert types. Such zones of contact are of great importance to ecological and botanical studies.

--> PLANET PEAK should be made an ACEC to protect its wildlife resources. The Bighorn Sheep are of much more than local interest. Bighorn Sheep attract people from throughout the state for observation, hunting, and construction of watering tanks; Bighorn Sheep herds are also used to repopulate former Bighorn

range. However, we do recommend that the portion of Planet Peak SMA which overlaps the Swansea WSA should be made part of the Swansea Wilderness Area, this also protecting the wildlife values. See our comments under wilderness.

--> CACTUS PLAIN WSA overlaps the SMA and the whole area should be designated wilderness. See our comments under Wilderness.

--> LA POSA PLAIN should be designated an ACEC. Its similarity to the Cactus Plain is one good reason for such designation, since it represents a rare and unique habitat type. Protecting it would protect natural diversity of the stabilized sand dune habitat. This area was recommended as a Natural Resources Experiment and Research Area in the 1975 MFP and BLM has since given no explanation why it should not be so designated.

--> BIG MARIA MOUNTAINS is the only ACEC recommended by BLM and we endorse its designation. It contains cultural resources of national significance, including geoglyphs. However, for the reasons explained in our comments on Wilderness, we recommend that the Big Marias WSAs which overlap part of the Big Marias proposed ACEC be designated wilderness.

--> MILPITAS WASH is of more than local significance because of the habitat variety it provides to California. BLM points out such significance by calling it ". . . one of the largest examples of virtually undisturbed Sonoran Desert remaining in California" (EIS, p. 63). The area takes on national significance by being written about in two books: THE NORTH AMERICAN DESERTS by Edmund Jaeger (Stanford, CA: Stanford University Press, 1957, p. 97) and THE SIERRA CLUB GUIDE TO THE NATURAL AREAS OF CALIFORNIA by John Perry and Jane Greverus Perry (San Francisco: Sierra Club Books, 1983, p. 296). These books receive national distribution. The relative abundance of vegetation in this area also recommends it as an ACEC, along with potential for destruction of the area from ORV use. Such an area is very much worthy of ACEC designation to protect its unique and irreplaceable characteristics.

--> LAGUNA-MARTINEZ is another area that cries out for ACEC designation. This is one of the limited areas of quality riparian habitat still remaining along the Colorado River. As such, it has tremendous value for wildlife and humans who enjoy that wildlife. It is also important to remember that this wildlife value was formerly recognized by designating much of this area part of the Imperial National Wildlife Refuge. This is essential habitat for the endangered Yuma Clapper Rail and the Arizona and California listed Black Rail. It is also an

17 extremely important area for the Yellow-billed Cuckoo, which is on the California state list. The Yellow-billed Cuckoo has been attracting increasing concern in California, giving the Laguna-Martinez area more than local significance. David Gaines and Stephen A. Laymon, who surveyed the whole State of

scenic views of the Gila Mountains and the horizon extends all the way to Sonora. The Sand Food is also a food of importance to the Papago Indians and was formerly used by them. Thus the area

18 is also of historic significance. This area was recommended as a Natural Resources Experiment and Research Area in the 1975 MFP and BLM presents no rationale for not designating it as such. It should at least be given that status unless BLM can give valid contrary reasons.

19 The plants occurring in this area (and in other SMAs) would apparently benefit from special management policies in Alternative C. (EIS, p. 118, Table 4-23). What exactly are these management policies, and if they could be included in Alternative C, which is biased towards production, why are they not included in the Preferred Alternative which is supposedly a more balanced management approach?

20 --> GILA MOUNTAINS is not an area considered by BLM for Special Management designation, but should be recommended as an ACEC. The area we are recommending is WSAs 5-39 and 5-40 as delineated in the Intensive Inventory. This area has high natural values, including Elephant Trees (Bursera microphylla) and there is Kearney Sumac (Rhus kearneyi), an extremely rare plant, in the Gila Mountains. Certainly the presence of Kearney Sumac would give this area national significance and be of great scientific value. The area to the north of I-8 needs to be protected from encroachment. It is also very scenic to travellers along I-8, again of national significance because of the wide areas they come from. ACEC status would also preserve the Gila Mountains as a scenic backdrop for Yuma, much as the Crossman Peak area is a backdrop for Lake Havasu City.

Finally, we would like to mention that the Yuma District contains nearly 2.7 million acres. Surely 16 ACECs (including our recommendation for the Gila Mountains) is not excessive when you consider that the California Desert District contains 12.1 million acres and 72 ACECs.

21 We feel that all 16 of the above areas are worthy of formal recognition and the security that such recognition and ACEC plans would provide. Since we have not seen the "management prescriptions" that BLM proposes for 5 of these areas, we cannot determine whether they would provide sufficient protection. If these areas are worthy of recognition (and they are) they should be designated ACECs, rather than relying on more easily altered and weaker "management prescriptions."

VEGETATION

We strongly urge BLM to designate priority management areas to all T & E and sensitive plants in the Yuma District. This could be done through wilderness management or ACEC designation, the

17 California for Yellow-billed Cuckoos state that "The Yellow-billed Cuckoo is at a critically low population level, not only in California, but in the northern Rocky Mountains, the Great Basin, and the Pacific Northwest as well" ("Decline, Status and Preservation of the Yellow-billed Cuckoo in California," WESTERN BIRDS 15:73, 1984). They further say of the Colorado River Valley: "Survival of the cuckoo in this region will require preservation of habitat" (Ibid., p. 72). They also flatly state that "The . . . center near Laguna needs protection" (Ibid.). I have observed Yellow-billed Cuckoos and heard Black Rail in this area. Further, "Shantytown" and the adjacent area attracts birders from much of California and Arizona, and is especially important to California birders who can see species otherwise rare within their state, such as the Gila Woodpecker, Abert's Towhee, Lucy's Warbler, Bronzed Cowbird, and Brown-crested Flycatcher (see A BIRDER'S GUIDE TO SOUTHERN CALIFORNIA by James Lane, Denver: L & P Press, 1976 and BIRDER'S CALIFORNIA by Don Roberson, Austin: American Birding Association, 1978).

Thus this area has a relevance and importance that is much more than just local, with high scenic and wildlife values and natural systems and processes (riparian). We are especially concerned that this area might be developed to the detriment of the wildlife and vegetation, including the "Shantytown" area which should retain its vegetation to the benefit of wildlife.

--> MUGGINS MOUNTAINS proposed SMA contains a larger area than the Muggins Mountains WSA. The WSA should be designated wilderness, for the reasons listed in our comments on wilderness. The remaining part of the SMA should become an ACEC because of its wildlife, cultural, and scenic values.

--> MOHAWK MOUNTAINS have high scenic values, being seen by people from all over the United States travelling along I-8. Thus their scenic value is of more than local significance. Other than impacts from military activities, the southern part of this range (south of I-8) is fairly well protected because of limited public access. The northern section also needs protection to preserve the integrity of the whole range. BLM doesn't even mention the wildlife values of this area. ACEC status would provide the protection this area needs from potential encroachment.

--> YUMA DESERT should be designated an ACEC because of its significant wildlife and scenic values, as well as its exemplification of a natural system and its processes. As Yuma expands, the habitat this area represents will become rare. Plants such as Sand Food (Ammobroma sonorae) and reptiles such as the Flat-tailed Horned Lizard and Fringe-toed Lizard either occur or may occur in this area and ACEC status would protect some of their range, which is continually shrinking. Euphorbia platysperma may occur in this area. This area also provides

latter if confined to a small area.

22 Are there riparian areas along the Colorado, Gila, and Bill Williams Rivers which would not be managed as priority habitat? If so, they should be managed as priority riparian habitat.

On p. 8 (Threatened and Endangered Plants), it should be mentioned that the Endangered Species Act requires consultation with the Fish and Wildlife Service in a "may affect" situation.

BLM should work with the Bureau of Reclamation and the State of Arizona to determine the status and distribution of Euphorbia platysperma. Our information is that it has only been found in two places in the world--near the mouth of the Colorado River in Arizona and in California at another location. So little is known of this plant that it could disappear (if it hasn't already), if it is indeed as rare as it seems.

23 Opuntia wigginsii also needs protection. This cactus species wasn't even recognized until 1963 and much more needs to be known about its distribution and requirements before destroying areas in which it occurs. Again, wilderness and/or ACEC designation would protect this species, especially if written into a management plan.

Bursera microphylla would receive protection by being included in our proposed Gila Mountains ACEC, as very likely would Rhus kearneyi.

The cactus species (Cereus greggii, Coryphantha vivipara alversonii, Ferocactus acanthodes acanthodes, and Opuntia wigginsii) also need to be protected, and in some cases wilderness and ACEC designation would do so--but not the Preferred Alternative. The public also needs to be educated as to the importance of leaving these cacti where they are rather than collecting them.

Pholisma arenarium would be protected in part by designating the Cactus Plain as wilderness.

CULTURAL RESOURCES

We feel that all areas of high cultural resource value or potential should be protected by ACECs. BLM needs to survey unsurveyed areas to determine what is there. Areas of moderate cultural resource value or concentration should be protected through management guidelines, and some of these should also be ACECs. As a minimum, we feel that all areas identified in Alternative E of the December 9, 1983 Resource Management Plan report should be designated ACECs and withdrawn from mineral entry, along with any other high value or high potential areas.

It goes without saying that National Register listed or eligible sites should be ACECs. The Yuma District has many priceless and vulnerable cultural resources, not just those in the Big Marias.

The religious concerns of American Indian groups over sacred areas, such as archaeological sites and mountains, should also be accomodated.

WILDERNESS

All 18 WSAs should be recommended by BLM for wilderness. As we show below, many of the management difficulties which BLM mentions could be resolved. We feel that rather than trying to resolve these difficulties BLM took the easy way out by recommending against almost every WSA in the Yuma District. We also find it curious that BLM is more concerned about whether there is wilderness within a 5-6 hour drive of Phoenix or Las Vegas than whether there are wilderness areas close to the cities and towns of the Yuma District so that people won't have to drive to the Prescott National Forest or Organ Pipe National Monument in order to enter a wilderness area.

Moreover, BLM claims conflicts with mineral potential or values in many of these WSAs. But nowhere in the EIS is there an indication of mineral potential and production outside the WSAs. The WSAs have been through a rigorous screening process, involving several cuts of areas. Then came the IBLA and Watt decisions to drop yet more areas. A 100,000 acre WSA in the Yuma District was dropped because of those decisions. What remains as WSAs is only the most outstanding. We can't say that for BLM's mineral evaluations of these WSAs, because non-WSA areas were never compared with the WSAs.

BLM's wilderness recommendations for the Yuma District are the paltriest since the Arizona Strip recommendations. There are 18 WSAs, but BLM proposes only two for wilderness. One of these is only 960 acres and the other has been reduced in size. The table below shows the meagreness of the Yuma District's recommendations in comparison with other BLM Districts in Arizona and southern California:

DISTRICT	ALL WSAS		BLM PROPOSED WILDERNESS		% OF ALL WSA ACRES PROPOSED BY BLM
	No.	Acres	No.	Acres	
AZ Strip	44	774,148	8	26,816	3.7
CA Desert	137	5,700,000	45	2,099,000	36.8
Phoenix	36	1,305,000	16	450,610	34.5
Safford	9	131,920	3	34,981	26.4
Yuma	2	205,105	2	51,510	25.1

Sources: Arizona Strip Wilderness Study Areas Draft EIS (1982); The California Desert Conservation Area Plan (1980); Upper Sonoran Draft Wilderness EIS (1982); Phoenix Draft Wilderness EIS (1984); Lower Gila South Resource Management Plan Draft EIS (1985); Safford District Draft Wilderness EIS (1983); Draft Yuma District Resource Management Plan (1985).

DEAD MOUNTAINS NORTH (WSA 5-1) AND DEAD MOUNTAINS SOUTH (WSA 5-2)

BLM should recommend that if the adjacent Dead Mountains WSA in the California Desert District becomes wilderness, so should these two units. The only rationale BLM has for recommending against these units is that without the adjacent CDCA WSA they are too small to be outstanding, and that the adjacent BLM WSA has not been recommended by the California Desert District.

However, if the adjacent WSA were designated wilderness, there are no conflicts to keep BLM from recommending these adjacent units. Both units lack man-made developments, are not grazed, have low recreational use and are too far from populated areas to attract it in the future, have low mineral, oil and gas, and geothermal potential and no mining claims, and all mineral leases are post-FLPMA which requires nonimpairment of wilderness values. Yet these areas would preserve the integrity of the Dead Mountains as a unit, have Desert Tortoise as a subsidiary value (contrary to BLM's claim that this WSA lacks special features), and are already withdrawn from mining.

BLM has also created a no-win rationale for wilderness by claiming on one hand (as with this WSA) that man-made boundaries (such as roads and utility lines) detract from the solitude of a wilderness area while on the other hand claiming that more natural boundaries are hard to identify (as with other WSAs).

BLM also never states the rationale for the Alternative D proposal which contains only 60 acres. What conflict that BLM perceives would be resolved by this alternative, and why was it rejected?

CHEMEHUEVI MOUNTAINS (WSA 5-3)

BLM rejects this WSA for wilderness on the grounds that its wilderness values are low and the Bureau of Reclamation wants it for a quarry.

Yet, this WSA has an overwhelming number of characteristics that proclaim it should be wilderness. While BLM claims it lacks supplemental features, there are Bighorn Sheep, Desert Tortoises, and a moderate potential for cultural resources. While on p. 66 of the EIS the adjacent California Desert District WSA is stated to be unsuitable, we discover in Appendix B that in fact this WSA is recommended as suitable by BLM in Riverside. This, by BLM's own reckoning, increases the wilderness quality of WSA 5-3 to moderate, not low. Nowhere does BLM present a convincing case that this natural area is the only place the Bureau of Reclamation can use for a quarry. A less natural area would be much more suitable for a Reclamation quarry site. Other conflicts are nonexistent for this WSA: there are no man-made developments, roads, or vehicle ways; there is

no grazing allotment. Including this WSA in the Chemehuevi Mountains Wilderness of the California Desert District would make the boundary more manageable (BLM has thrown out other WSAs because they have "unmanageable" boundaries--here is an opportunity to contribute to the manageability of a wilderness area, and BLM wants to forego it!); there are no mining claims, no mineral occurrences, no mineral potential, and low oil, gas, and geothermal potential; the oil and gas leases are post-FLPMA; and the area is unattractive to ORV users. This area is just as worthy as WSA 5-4 and BLM should recommend it for wilderness.

CHEMEHUEVI/NEEDLES (WSA 5-4)

We agree with BLM that all of this WSA should be designated wilderness. It should be pointed out that there is an error on p. 66 of the EIS where it is stated that the adjacent California Desert District WSA was recommended as unsuitable. Our reasons for recommending this WSA for wilderness are the same as for WSA 5-3: the area would add to the quality of the adjacent Chemehuevi Mountains WSA in the California Desert District and the lack of conflicts and its values outweigh nondesignation.

CROSSMAN PEAK (WSA 5-7B)

The analysis BLM provides for this area is curious. After stating why BLM feels this area is unmanageable as wilderness, the EIS then goes on to be a very strong case for designating this area wilderness. BLM's rationale for rejecting this area can in fact be reversed by looking closely at the arguments against designation; and certainly a large part of this WSA could have been recommended for wilderness by BLM.

BLM says that there is high mineral potential in part of the area and 212 mining claims that would make the area hard to manage. However, the vast majority (174) of these claims are post-FLPMA. BLM also admits that the areas of mining interest and limited, and not spread over the whole WSA. Moreover, we discover that most of the claims are inactive.

BLM also states that the area would be difficult to manage because of cherry-stemmed roads and vehicle ways. But of 5 roads, 2 have been only irregularly maintained, and the vehicle ways follow washes, with evidence of vehicle use unnoticeable except after recent use. This also weakens BLM's argument that a vehicle way and road nearly bisect the WSA, since the "vehicle way" apparently isn't that noticeable.

The WSA also includes 3 ephemeral grazing allotments, but 2 of these haven't been used recently, and there are no improvements planned for the other grazing allotment. Thus, wilderness designation would have no effect on grazing use.

BLM's description of the wilderness values of this WSA on p. 197 of the EIS indicate that this is a high quality WSA. The Summary of Wilderness Quality in no way does justice to the description of the WSA that appears in the two paragraphs preceding it. The emphasis in BLM's description of this area is that in spite of mining activity, this WSA has tremendous wilderness qualities because its rugged terrain screens out evidences of human activity. In fact, the screening is so effective that this WSA could support "substantial numbers" of people seeking a quality wilderness experience. BLM should look at this area again and recommend at least a substantial part of it for wilderness. Supplemental values include areas of high cultural resource values and diverse wildlife values including springs, riparian vegetation, Bighorn Sheep, and a variety of amphibians in the springs.

WHIPPLE MOUNTAINS ADDITION (WSA 5-10)

The arguments for exlcuding this areas from wilderness are inconsistent. BLM's rationale is based on the claim that the WSA has moderate wilderness values and these do not outweight the mineral values of the WSA. But this rationale collapses when the data are examined more closely. On p. 158 of the EIS, in rejecting the area, BLM claims that the WSA has "moderate" wilderness value (when considered with the adjacent California Desert District Whipple Mountains WSA). Yet on p. 199 we discover that the area has "high" wilderness value (when considered with the Whipple Mountains WSA)! Apparently the wilderness value of a WSA can change from one page to another, dependent on whether BLM wishes to reject it or not. The area contains only 9 mining claims and is presently withdrawn for the Bureau of Reclamantion. Thus, wilderness designation would merely continue a mineral withdrawl, not establish a new one. BLM could have at least recommended Alternative D for this WSA, which resolves the mineral conflicts seen by BLM, but even it was rejected. There are no other conflicts in this area--it is not used by ORVs, is not part of a grazing allotment, and man-made features are not noticeable. Yet it does provide rugged habitat and supplemental values such as wildlife and moderate potential for cultural resources and high cultural significance to American Indians. Added to this is the California Desert Distrct recommendation of the Whipple Mountains WSA (#312) and its high ranking among WSAs by the California Desert District (8th out of 137 WSAs).

GIBRALTAR MOUNTAIN (WSA 5-12)

This is a high quality area as it now stands and would be of even higher quality if BLM acquired the lands mentioned in Alternative E. Again, it appears that BLM has taken the easy way out rather than attempt to come up with a proposal for designating at least part of this WSA as wilderness.

BLM's main objections to wilderness for this area are ORV use and mineral potential. Except for the Parker 400, BLM never clearly explains the impacts of ORVs on this area. It is BLM's reponsibility to protect WSAs from impairment by ORVs. Has straying from the Parker 400 impaired the wilderness values of this WSA? Is that why BLM is recommending against wilderness designation? Why does BLM allow an ORV race to border WSAs? This is like putting a cat next to a canary in a cage with the door open.

Yet, BLM's judgment is that this area's wilderness value is moderate. The high value core of this WSA should be combined with other areas to make a unit of over 5000 acres.

Values are quite varied in this WSA. The ruggedness and deep water courses provide solitude; besides hiking and horseback riding there is also rock climbing for primitive recreation. Supplemental values are abundant. Cultural resource values are high, with a whole archaeological district eligible for inclusion in the National Register. Unusual plants include Barrel Cactus and unusual animals include Desert Bighorn, Desert Tortoise, and the Federally endangered Bald Eagle and Peregrine Falcon.

This is obviously a high value area and BLM should attempt to resolve the conflicts perceived in designating this area wilderness.

CACTUS PLAIN (WSA 5-14A/B) AND EAST CACTUS PLAIN (WSA 5-17)

These two WSAs are an integral unit and should both be designated wilderness in their entirety. BLM's rationale for rejecting the East Cactus Plain just doesn't wash. The claim is that for some unstated reason management would be so difficult that even pulling back the boundaries of the wilderness could not overcome these management difficulties. Surely the management difficulty cannot be mining--there are only 6 mining claims in the WSA, and all are post-FLPMA. Moreover, mineral potential is low and BLM states mineral development is unlikely. The management problem is not grazing--the allotment for the East Cactus Plain hasn't been used in a number of years and no improvements are planned. What then is the management problem? ORVs? But BLM states that this would be a problem only at a few access points. Moreover, just because people might drive into a wilderness area is no reason to reject one, especially with such high values. Why is BLM pulling back to less obvious boundaries for the Cactus Plain WSAs when unclear boundaries are given as a reason for rejecting other WSAs for wilderness?

The East Cactus Plain has virtually the same wilderness and supplemental values as the Cactus Plain WSA (5-14A/B). And it includes most the the Bouse Sand Dunes, which were recommended as a Scientific Natural Area by the Arizona Academy of Science

in the 1970s.

As for the Cactus Plain WSA, all of it should be designated. We have no objections to Parker seeking a new townsite, but we don't think it should be located in a Wilderness Study Area which should be designated wilderness. BLM also states that mineral values are low in the Cactus Plain WSA. At the least, BLM could have recommended wilderness for the East Cactus Plain to make up for the area chopped off the Cactus Plain WSA recommendation.

SWANSEA (WSA 5-15A)

With its riparian area, this WSA is a jewel among WSAs and should be recommended for wilderness by BLM. BLM's rationale for excluding the area is high mineral values in part (but not all) of the WSA and mining claims. Subsidiary problems are also cited, such as vehicle access and boundary definition, which are similar to other WSAs and which we address under other WSAs. This area is capable of providing great solitude and primitive recreational opportunities with its rugged topography and deep drainages. It has high subsidiary values, such as wildlife (including the riparian species Bell's Vireo and Yellow-billed Cuckoo) and part has been recommended as a National Natural Landmark. What other wildlife may be in the area is unknown, because while BLM has looked very carefully into the mineral values of this WSA, no wildlife inventory has been carried out in an area of high value.

We suggest that BLM look again at this area and recommend it for wilderness. Even if the mineral values prove to be high, BLM could decide that wilderness values outweigh the mineral values. Valid existing mineral rights are protected under wilderness designation. The value of this WSA is more than moderate, if only because it includes some rare riparian habitat. This was not even taken into consideration in evaluating whether this WSA would contribute to natural diversity of ecotypes in the National Wilderness Preservation System, and it should be.

KOFA UNIT 3 SOUTHERN ADDITION (WSA 5-31)

BLM rejects this WSA for wilderness because of its size and projected vehicle incursion. However, p. 160 of the EIS states that this unit is manageable as wilderness. The vehicle ways do not affect the naturalness of the area, and one is revegetating. The area has no mineral potential nor are there any mining claims nor gas and oil leases. BLM should treat this area similarly to Kofa Unit 4 Northern Addition, and transfer contol of it to the Kofa National Wildlife Refuge if the adjacent refuge area becomes wilderness. This area forms a natural unit with the proposed refuge wilderness.

Besides containing part of the Castle Dome Mountains, supplemental values on this WSA include sensitive species of cactus and possibly Desert Tortoise. We find no real reason not to recommend this WSA for wilderness and are surprised that BLM did not at least recommend the same disposition for it as for Kofa 4 North. We also feel that all of Kofa 4 North should be transferred to the Kofa National Wildlife Refuge because it is an integral part of the larger refuge wilderness proposal.

LITTLE PICACHO PEAK SOUTH (WSA 5-35)

BLM's objection to recommending this area appears to be that it is adjacent to a non-recommended WSA in the California Desert District and that it is too small to be designated wilderness on its own.

Since the boundary between the Yuma and California Desert Districts is an artificial line bisecting a contiguous natural area consisting of the two WSAs, sharing drainages, for example, we feel BLM should recommend that the Little Picacho Addition WSA be designated wilderness if the adjacent Little Picacho WSA is designated wilderness by Congress, whether the California Desert District recommends the Little Picacho Mountains WSA or not.

BLM seems to entertain the possibility that the Little Pichacho WSA could become wilderness by coming forth with further objections to wilderness designation for the Little Picacho Peak Addition WSA. Yet all of these claimed management difficulties could be resolved and the WSA recommended for wilderness by BLM.

One of BLM's objections to recommending this WSA is that "Intensive recreational use prevails in the vicinity of this WSA. Management of the area would therefore require frequent surveillance for non-compatible recreational uses . . . ." (EIS, p. 212). Yet in the same paragraph we find that ". . . the rugged topography would inhibit vehicular travel through most of the area." Isn't BLM now required to protect the wilderness values of this area? How would wilderness designation increase the frequency of surveillance required over what is now occurring? Is BLM monitoring this WSA for activities causing impairment? And since BLM proposes to limit vehicles to existing roads and trails in this part of the District, why would vehicles be in a roadless area which presumably has no existing roads and trails ("The WSA is entirely natural condition with no noticeable human imprints present in the area", EIS, p. 212). Even if the WSA were not designated wilderness, BLM's vehicular travel policy would require vehicles to be kept from entering this area. Thus there would be no management problem because of wilderness designation.

BLM also rejects wilderness for this area because of claimed mineral conflicts. There are mineral deposits within several

miles of the WSA and the area is judged to have a "moderate" potential for minerals but low potential for oil, gas, and geothermal energy sources. Yet most of the WSA is under mineral withdrawl by the Bureau of Reclamation, the mineral potential is not high, and there are only four mining claims. The gas lease on the WSA is post-FLPMA and must thus be administered so as not to impair wilderness values.

This WSA has high wilderness value with its neighboring area in the California Desert District. It is rugged and would provide outstanding solitude and primitive recreation. It also has supplemental values such as a rare cactus, Bighorn Sheep habitat, and considerable cultural resource potential.

The EIS never explains why Alternative D for this area was rejected by BLM. Was D an attempt to resolve what BLM sees as the management problems of this area, such as by excluding the flatter areas accessible to ORVs? At the least, BLM could have recommended Alternative D if this was the case, but instead the whole area was thrown out. This WSA should be recommended for wilderness if the adjacent CDCA WSA becomes wilderness.

MUGGINS MOUNTAINS (WSA 5-53A)

This is another area in which BLM's claimed management problems appear to be resolvable. The EIS states (p. 159), "While wilderness values are high in the unit's core, they are not sufficient to outweigh mineral potential or management problems associated with the large number (283 as of November 1982) of mining claims. It would also be difficult to close several vehicle ways to ORV traffic." Yet the U.S. Geological Survey has determined that mineral potential of this area is low, with the exception of moderate uranium and thorium potential in a very small part of the WSA. How can low mineral potential outweigh high wilderness values?

All of the mining claims in the WSA are post-FLPMA. All these claims, if developed (and the mineral potential is low) must not impair wilderness values becuase they are post-FLPMA. This gives BLM the management tool necessary to prevent adverse impacts to wilderness values in this area.

As for vehicle incursion, if necessary, BLM could have recommended cherrystemming the vehicle ways. However, these are vehicle ways, not roads. Are they "established" roads or trails under BLM's criteria for vehicle travel in this area? Since BLM proposes to restrict vehicles to existing roads and trails in this area, we suspect that these vehicle ways would not qualify as "existing" and BLM would have to keep vehicles out of this WSA even if it were not recommended for wilderness in order to enforce the vehicular travel part of the RMP.

Thus, we feel this WSA should be recommended for wilderness. It high wilderness values are amply documented in BLM's own EIS, including outstanding solitude and primitive recreation, including rock climbing, and supplemental values, such as a species of cactus (the Wiggins Cholla) which wasn't even known to exist until 1965 and an area of high concerntration of archaeological sites.

Surprisingly, BLM appears to have attempted to resolve the claimed management conflicts through Alternatives C and D, yet then rejected both of these alternatives for this WSA. Why?

Time prevents us from evaluating BLM's rationale for the remaining WSAs. Both Trigo WSAs would certainly be high on our list of areas that should be designated wilderness. However, we would be happy to sit down with BLM and other interests and explain why we feel these WSAs should be designated wilderness. We feel BLM should throw out their recommendations in this plan and get the affected interests together to talk seriously about where the real conflicts are. This approach was used concerning the Arizona Strip wilderness proposal and much more wilderness was eventually designated by Congress than BLM recommended.

RIGHTS OF WAY FOR UTILITY CORRIDORS AND COMMUNICAION SITES

We are opposed to use of corridors in proposed Special Management Areas or Wilderness Study Areas. Corridor UC-2B through the Crossman Peak area and UC-5, which traverses the Cactus Plain, should not be authorized.

Yuma Audubon is strongly opposed to the proliferation of transmission lines and pipelines through the Kofa National Wildlife Refuge. We believe corridor UC-7 along I-10 should be the preferred route through this area. The Palo Verde-Devers route (UC-8) seriously disrupts the integrity of the refuge, which is also an agency-endorsed wilderness area. To avoid impacts to this sensitive area, the recently proposed All American/Celeron pipeline will be routed along I-10, even though the monetary costs would be lower if they took the route through the refuge. We recommend that no further facilities be constructed in corridor UC-8.

24 The section on p. 18 does not say which corridors are existing and which are proposed. We need this information to properly assess environmental impacts. In addition, what is the expected demand for utility and communication sites in the near future?

Generally, we are in favor of locating utility corridors along highways, canals, or through urban and agricultural areas as opposed to desert areas.

We object to the concept of locating utility and communication facilities anywhere it is convenient (see p. 27, Issue 5). Even

in a production-oriented alternative it makes sense to concentrate this use into corridors so that other lands can be utilized for other purposes.

The Marine Corps Air Station is considering expansion of air space through which they fly low-level maneuvers. We believe this expansion should not occur on BLM lands. Low-level flights disturb wildlife and detract from recreation, wilderness, and aesthetic values.

RECREATION

General Objectives

25 The Preferred Alternative has a dangerous loophole, "provide additional lands for recreation where warranted by increased demands." With increased winter visitor numbers and the Colorado River as an attraction, one could project an infinite demand for more and more Federal recreation sites. The demand is encouraged by providing free or cheap long-term use which makes public lands more desirable than the abundant privately owned sites which charge more. With such lack of realistic limits on how much recreation the Yuma District can support, the sole function of BLM could become recreation and all personnel would be used to monitor and maintain recreational sites. Some limits needs to be established, as we suggest below.

Alternative A seems more desirable as it would accomodate "existing use but not encourage additional use." However, this wording is unclear. A better verb would be "authorize" rather than "encourage" as Alternative A leads one to believe that additional sites would be authorized if "need" arises although BLM would not actively encourage further development. Alternative D is more practical by adding the feature of using existing sites where no severe resource degradation occurs. No expansion would be authorized. BLM would be free to maintain and monitor existing sites.

Long-term Visitor Use

The Preferred Alternative states that LTVAs will continue and visitors will be directed to those areas. By not specifically stating that there will be no expansion or additions to these areas, room may be left in the Preferred Alternative for more such areas.

Only Alternatives C, D, and E state that no more LTVAs will be established. E states there will be no expansion of existing areas. It is difficult to see how any additional recreational development can be anything but a "significant impact to natural values" (p. 20). It is stated that if this happens, development will not be allowed. So it seems that development of more sites

would be ruled out under all alternatives.

It is important that no future development or expansion of LTVAs occur. It is not consistent with BLM's function to compete with private businesses by providing free or low cost facilities for winter visitors. Expansion of privately-run winter visitor facilities in the Yuma and Quartzsite areas would indicate there are plenty of areas for visitors. Public lands should be kept for limited occupancy (such as camping), not near-permanent residence.

Closing 7% of the area to wood collection is also not enough. As desert environment does not produce much wood and some areas are already denuded, and other areas will then be moved into, we support no collecting of wood for any purpose.

ORV Use

26 We applaud BLM's proposal to limit the number of open areas and require driving on existing routes throughout most of the District. But since BLM nowhere defines "existing," we recommend that BLM designate which routes are open for vehicle use and that vehicles be prohibited from going off these routes, so as to protect the fragile desert environment. The open areas recommended by BLM in the Preferred Alternative are more than enough to sacrifice.

We suggest that the term ORV be eliminated and all vehicles on Federal land be driven on designated routes, except in emergency situations.

We also suggest distinct markings of the open areas so there is less possibility of vehicles straying into non-open areas.

Flood Plain Management

27 The multiple use concept presents conflicts especially when BLM is directed under BLM Floodplain Manual 7221 objectives as described on p. 241: "Restore, maintain and reserve the natural and beneficial functions of the floodplain." The concept of maintaining wildlife habitat with the principal object of public recreation seems difficult to realize. How can "restore, maintain and reserve" be consistent with public recreation in the floodplain?

Alternative B (p. 243) states "Riparian areas and wildlife habitat are not priorities. . .floodplain values would not benefit. . . ." This goes against BLM Floodplain Manual 7221 which requires BLM to restore, maintain and reserve natural and beneficial functions of the floodplain (p. 241).

Management of Concessions and Leases

We feel that recreational leases and concessions are appropriate on public lands only where private or Indian lands are not available for these purposes. By no means should BLM be in competition with the private sector for obtaining leases and concessions. Fees should be as much as or more than those charged on non-Federal lands.

On p. xii, Table S-1, for the Preferred Alternative we suggest that the final sentence of the management policy for concessions and leases be amended to read "Additional federal . . . feasibility, and low level of conflict with other resource values."

28 The RMP needs to be more specific about where new concessions and leases would be allowed and which concessions are expected to expand (EIS, p. 20). We recommend designating areas for this purpose, the size of which should be directly related to projected demand for these facilities. Without this information it is not possible to evaluate the impacts which could result from recreation concessions and leases.

As regards leases, we feel that leasing land expressly for the purpose of agriculture is inconsistent with multiple use objectives. As a result, depending on the natural potential of the land, we recommend that these lands be exchanged (but not sold) or the leases terminated.

Recreation Resources, Colorado River Recreation Opportunities

29 We agree that a careful analysis needs to be made before developing new or expanding existing recreation sites (p. 19). But what are the criteria for demonstrating feasibility? In other words, how will BLM use the benefit-cost user profile, preference, and other information to determine feasibility?

30 Is there a delineated floodplain (p. 19)? If so, where are its boundaries? We suggest that where levees exist, the floodplain be considered anything within those levees. We also suggest that only those facilities that can be quickly moved out of the floodplain be allowed on public lands. Picnic tables, trash cans, grills, outdoor showers, etc., which are "floodproofed" may well survive a flood, but are often buried under tons of silt, mud, and debris. The cost of digging them out usually far exceeds the cost of moving them temporarily to higher ground.

Other

Recreation impacts from Special Management Areas (p. 83)--we feel that designation of Special Management Areas would maintain OR ENHANCE primitive and semi-primitive non-motorized recreation.

31 Recreation impacts from rights of way (p. 93)--why would locating powerlines or pipelines through the La Posa LTVA displace users of this area? Would they be prohibited from parking beneath transmission lines?

32 The value of any BLM land management plan is directly related to the enforceability of that plan. Implementation of off-road vehicle regulations, camping and wood cutting restrictions, collection of LTVA fees, etc., will require law enforcement capability. This issue should be dealt with in the plan. We favor the hiring of BLM Rangers to enforce the plan; however, a cooperative agreement with local police and sheriffs could achieve the same results.

LAND OWNERSHIP ADJUSTMENTS

We recommend that BLM exchange rather than sell land, and that the amount disposed of not exceed the amount acquired. If BLM prefers exchange to sale, why is there a net loss of land in the Preferred Alternative?

It is encouraging to see that the Preferred Alternative shows no new acquisitions for grazing. But the Preferred Alternative shows a low amount of land acquisition for wilderness; 9% is a small amount.

33 Alternative D, which is called the "balanced protection" alternative is really not balanced. Only 25% of the acquired lands will be for wilderness, while 19% will be for grazing. In fact, in the Cactus Plain, 6720 acres would be for grazing and only 2720 for wilderness.

The larger part of the land to be disposed of is in the Yuma area. The closest acquisition to Yuma would be A-88 which is north of the Imperial National Wildlife Refuge.

34 BLM should retain many of the areas proposed for disposal because of high natural values. It appears that areas D-1 and D-2 contain land in the Gila River floodplain. To dispose of such land would be inconsistent with the recent proposed land exchange between the Bureau of Reclamation, Wellton-Mohawk Irrigation District, and private land owners in this area. Specifically, the following Federal lands appear to be in the Gila River bottom: T. 8 S., R. 16 W., Secs. 17 and 26; T. 8 S., R. 17 W., Sec. 28 (not river bottom, but has Antelope Hill, which could be retained); T. 8 S., R. 18 W., Secs. 27 and 30; T. 8 S., R. 19 W., Sec. 35; T. 9 S., R. 19 W., Secs. 3 and 4; T. 7 S., R. 16 W., Sec. 25; T. 8 S., R. 16 W., Secs. 4 and 5.

Area D-3 contains Owl Wash, a high value wildife area, and should be retained.

Area D-4 may contain river bottom or riparian lands which should be retained, specifically T. 8 S., R. 22 W., Sec. 30 (Gila River bottom); T. 8 S., R. 24 W., Secs. 28, 32, 33 (riparian?) and T. 9 S., R. 24 W., Secs. 5, 7, 8, 18, 19.

The cultural resource areas in D-5 should be retained in Federal ownership.

D-6 should be added to the adjacent Lake Mead National Recreation Area if BLM doesn't want it. It has some significant washes with presumably high wildlife value.

D-7 has cultural resources and these should be retained in

Federal ownership.

35 D-9 has Castaneda Wash, a large wash in T. 11 N., R. 16 W., Secs. 9 and 16. There is also a large wash in Sec. 17. The habitat values of these lands should be described. Is BLM planning to exchange these lands with the State, which owns the adjacent sections?

If D-8 is disposed of, it should be for exchange only. Would it go for parcels to the south?

Alternative E is the least objectionable land ownership adjustment alternative as it has no net acreage loss and no acquisitions for grazing, but it has a disappointingly low percentage of land acquisition for wilderness.

ECONOMICS

The relationship between Table 2-4 and the 91 parcels in Map 9 is not shown and is not clear. We recommend a tabular relationship be added to connect Map items 1 to 91 with 2a to 2q in Table 2-4 for clarity.

36 It is not understood how "lands currently open to mineral entry and leasing would be exchanged for lands closed to these activities" (p 82) relates to Table 4-3, Acquired Lands Open to Mineral Entry under . . . Law of 1872. Are these concepts in agreement? What is the effect of the text, p. 82, on the status

37 of 39,340 acres and 58,120 acres in Table 4-3? Open or closed? Area 3, p. 82 is a reference to D-3 on Map 9?

38 On p. 91, Is "exploration impeded" but other development not "impacted" correct? If so, it seems active claims could be worked during periods of closure of the Bighorn Sheep lambing grounds.

ENVIRONMENTAL CONSEQUENCES

39 Impacts from mineral and energy development could be substantial, yet were not discussed in this section. Please expand this section to include consideration of these impacts.

40 We would also like to see an expanded discussion of impacts resulting from the Parker 400 ORV race.

UNMITIGATED IMPACTS

If BLM implements the Preferred Alternative, there will be a considerable number of unmitigated significant impacts. These should either be mitigated or not allowed to occur.

There would be no mitigation for adverse impacts to natural areas and features from cattle grazing on the Cactus Plain (p.

94).

Vegetation would also face unmitigated adverse impacts form grazing (p. 94), meaning that the Muse allotment (which includes part of the Cactus Plain) vegetation trend would continue and the La Posa Plain stabilized sand dunes would be negatively impacted.

From LTVAs, there would be adverse impacts on 4 special status species (all are cacti), and no mitigation is proposed for the negative impacts to vegetation from the Parker 400 to Osborne Wash, a large wash dividing several WSAs.

41 Wildlife would suffer unmitigated impacts from grazing on the Nine-Mile allotment if improvement were put in. Competition with wildlife would occur (p. 98).

Land ownership adjustments would also cause unmitigated adverse impacts under the Preferred Alternative. Disposal of areas D-3 and D-9 would result in unmitigated negative wildlife impacts (p. 98). Since BLM doesn't know who would get the land or what they would do with it, a worst case scenario is appropriate.

Rights of way would negatively impact wildlife from the Parker-Blaisdell Utility Corridor, which would cut off a Bighorn Sheep and deer migration route. This is unmitigated.

Finally, BLM proposes no mitigation for the site-specific impacts of the Parker 400 on wildlife (p. 98).

MONITORING THE PLAN

P. 79, item 4 mentions a monitoring plan. This needs to be discussed in detail and made a part of the RMP.

A plan is of little value if it claims it will protect resources but no or inadequate monitoring occurs. The monitoring part of the plan should be evaluated at the same time as the rest of the plan. The Forest Service already does this in their planning process and BLM would do well to adopt the same procedure.

42 Such a monitoring element of the plan should establish threshhold values at which appropriate action would be taken, such as closure of access to protect resources that are being degraded, or reduction of cattle numbers if degradation continues or improvement does not occur.

However, we question the value of indicator or key species in monitoring the status of all wildlife species.

It is much better to present the monitoring plan in the Draft Plan and EIS than come out with it later when a protest or appeal would be necessary to attempt to change it, rather than

the comment process of which this letter is part.

Sincerely,

Cary W. Meister
President

229

WELLTON-MOHAWK
IRRIGATION AND DRAINAGE DISTRICT
WATER POWER
ROUTE 1, BOX 19 WELLTON, ARIZONA 85356
TEL: (602) 785-3351

April 18, 1985

Mr. J. Darwin Snell, District Manager
United States Bureau of Land Management
P. O. Box 5680
Yuma, Arizona 85364-0697

Re: Draft Yuma District Resource Management Plan
and Environmental Impact Statement

Dear Mr. Snell:

We have reviewed the Draft Yuma District Resource Management Plan and offer the following comments for your consideration:

Like the USBR, on the Colorado River, this District and Yuma County have the responsibility for flood control along the Lower Gila River. The one main ingredient common to all flood control is quarry rock necessary to maintain banks and levees. We also have a need to locate and preserve adequate permanent material sites. We hope that this can be accomplished under the preferred alternative should it be implemented.

1 The riparian areas identified under the preferred alternative, to be managed as priority wildlife areas, include 1,500 acres along the Gila River. While they are too small to identify on the map, we must assume they are within the high frequency flood plain. As you are aware, we have designed and received approval to construct a 10,000 cfs channel enhancement project for flood control and flood damage protection. We hope that flood control purposes is one of the compatible uses of a "priority wildlife area" as it is within the designated Fred J. Weiler Greenbelt. Not to allow the use of a flood plain for flood control would lead to extensive damage to adjacent land and structures.

In general, we find the Draft Resource Management Plan does a good job of addressing the issues and defining the impacts. We support the preferred alternative within its balance of values. Thank you for the opportunity to comment on the draft Resource Management Plan.

Sincerely yours,

C. L. Gould
Manager

CLG:HRG:mlw

230

CITY OF YUMA

SPECIAL SERVICES DEPARTMENT
1793 South First Avenue
Yuma, Arizona 85364

April 18, 1985

Planning Team Leader
Bureau of Land Management
Yuma District Office
Post Office Box 5680
Yuma, Az 85364 - 0697

Dear Sir:

Please consider the following comment on the Yuma District Draft Resource Management Plan (RMP) and Environmental Impact Statement.

1 The City of Yuma requests that the RMP address the issue of determination of best mechanism to make all federally owned lands within the boundaries of the Yuma Crossing Park (YCP) available for parks and recreation purposes (Attachment). The bulk of the federal property is U. S. Bureau of Reclamation (BOR) withdrawn lands of the historic U. S. Army Quartermaster Depot (1860's) site. This area is currently occupied by the Yuma County Water Users Association (YCWUA), however under the conditions of the newly negotiated and shortly to be approved BOR/YCWUA contract, the YCWUA will be relocated in two years. This national historic landmark site is a critical element in the development of the Yuma Crossing Park. Any remaining parcels under federal ownership are important to provide for contiguous development of the park that will stretch for some 2 miles along the banks of the Colorado River at Yuma. Ideally, these federal properties would be transferred to the Arizona State Parks Board, who will develop that portion of the park.

Thank you for considering this request.

Sincerely,

Gwen Robinson
Yuma Crossing Park Coordinator

Attachment

231

Planning Team Leader
Yuma District - BLM
P.O. Box 5680
Yuma, Az. 85364-0697

Re:- Wilderness Study Areas

1. Agree that areas are unsuitable for wilderness.

2. Economics of Colorado River area are best served by multiple use land.

3. Outstanding job by Yuma District BLM in informing the public & users of the public land.

Carol & Frank Rigmon
R. Steve Bell

262

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EXPRESS MAIL

April 18, 1985

Dennis Turowski, Planning Team Leader
Bureau of Land Management
Yuma District Office
3150 Winsor Avenue
Yuma, AZ 85364

Re: Comments on Draft Yuma District Resource Management Plan and Environmental Impact Statement

Dear Mr. Turowski:

Enclosed are comments prepared by the Colorado River Indian Tribes on the Draft Yuma District Resource Management Plan and Environmental Impact Statement ("RMP"). Attached to these comments and incorporated in them by reference are comments which the Tribes are submitting to the District on its Draft Big Maria Cultural Resource Management Plan ("Big Maria CRMP"). Although the RMP makes no reference to the Big Maria CRMP, many of the Tribes' comments on the Big Maria CRMP apply also to the RMP. Also attached is a Tribal Council resolution which pertains to the RMP.

Introduction

As the Tribes point out in these comments, the RMP proposes a number of uses and activities adjacent to Reservation boundaries, on traditional Tribal lands, which would adversely affect the Tribes and which would violate the four-mile buffer zone surrounding Reservation boundaries which the Tribes have requested. For example, the District has made plans to increase the communication facilities and utility corridor on and near Black Peak and to continue to permit grazing there, despite the strong spiritual significance of that location to Tribal members. This
1 problem is one illustration of the fact that the Tribes have been afforded an insufficient voice in the District's planning and management process, despite the fact that they are the largest landholder in the District other than the

Letters Received That Were Similar To Letter No. 231

Forty-eight letters were received that were similar to letter number 231 in that they expressed agreement with BLM's recommendations on wilderness study areas and supported multiple use on all other public lands. Since these letters did not present new data or dispute either the facts or the outcome of the environmental analysis, they are not reproduced here. Following is a list of index numbers assigned to these letters. Table 6-2 identifies the letter writers.

232	249	261	292
235	250	274	293
237	251	276	294
238	252	278	295
239	253	279	297
240	254	283	299
242	255	286	303
243	256	287	304
245	257	288	305
246	258	289	306
247	259	290	307
248	260	291	313

federal government, and most of the District is comprised of traditional Tribal lands.

Other major weaknesses in the RMP are the lack of specific management policies and the absence of inter-agency corrdination, both of which are also problems in the Big Maria CRMP.

Comments and Recommendations

1. Buffer Zone

Several significant activities adjacent to Reservation boundaries are proposed or evident in the RMP which would adversely affect the Tribes and would violate the four-mile buffer zone surrounding the Reservation which the Tribes have requested. Specifically, the District' plans for Black Peak and neighboring areas, and the District's recent relinquishment of lands south of Black Peak for future acquisition by the town of Parker and for mining activities are discussed elsewhere in these comments.

On October 12, 1984, the Tribal Council passed Resolution No. R-122-84 requesting the Bureau of Land Management to maintain a four-mile buffer zone on lands managed by the Bureau adjacent to the Reservation. (Resolution No. R-122-84 is attached hereto.) The Resolution points out that the current Reservation boundaries do not reflect the true extent of traditional Tribal boundaries and therefore the Tribes have cultural and spiritual concerns on lands adjacent to the Reservation. In addition, activities on lands adjacent to the Reservation have a direct effect upon the Reservation and Tribal members. For example, the Tribes are experiencing law enforcement and other problems in areas of the Reservation abutting heavily developed off-Reservation lands. Those problems would be greatly exacerbated by further development along the boundaries of the Reservation. A four-mile open space buffer zone on Bureau lands would help to prevent these infringements upon the Tribes and to protect the cultural, spiritual and economic concerns of the Tribes. The RMP preferred

alternative, however, evidences a choice by the District not to respect such a buffer zone requested by the Tribes.

2. Black Peak

One of the issues on which the Tribes have repeatedly made strong recommendations to the District is that of Black Peak. As the RMP notes, the preferred RMP alternative would result in considerable impacts upon both the spirituality of the area and its substantial cultural resources. Currently, there are two communication facilities on Black Peak which the Tribes have requested be gradually phased out because of the spiritual significance of this location, and the disturbance to the spirituality which is created by the facilities. Rather than phasing out the facilities, however, the RMP calls for increasing them from two to five (RMP, p. 19). It also recommends designation of a one mile wide utility corridor running along the Reservation's northeast boundary directly across Black Peak. In addition, despite the Tribes' requests, it proposes to continue to permit grazing in the Black Peak area which grazing damages and destroys significant cultural resources in the area.

2 The Tribes reiterate their strong recommendation that, because of the extreme spiritual significance of the area, the communication facilities on Black Peak be phased out rather than expanded and the utility corridor be located elsewhere. The RMP should at minimum analyze alternatives to the proposed activities on Black Peak, which it fails to do. Similarly, grazing in the vicinity of the cultural sites near Black Peak should be terminated since, as the RMP indicates, fencing is inadequate to protect the sites.

It is distressing for the Tribes to note that on this issue on which they have repeatedly expressed their strong position that the District's proposal would clearly harm their religious and spiritual concerns, the District has ignored the Tribes and proceeded with its proposal.

3. District Land Relinquishment.

The Tribes understand that the District has turned over to the State of Arizona for future annexation by the town of Parker a site lying on the eastern boundary of the Reservation, south of Black Peak and west of the Cactus Plain Wilderness Study Area. While some of the lands at that site were already owned by the State, it appears that the majority of the site was relinquished by the District to the State recently, after the RMP planning process had begun. In addition, several miles south of that location, just east of the eastern boundary of the Reservation, it appears that additional federal lands within close proximity of the Reservation have recently been transferred from the District to the State. The Tribes understand that this transfer relates to potential mining activities. The Tribes were consulted upon neither of these two transfers of land adjacent to the Reservation and within the four-mile buffer zone.

3 Due to their location adjacent to the Reservation, the uses permitted and planned on these transferred lands are very important to the Tribes. Urban uses, for example, at the Parker annexation site could have many detrimental impacts upon the Tribes, upon the spiritual and cultural sites nearby, and upon the Cactus Plain Wilderness Area. Mining activities at the southerly site could also have substantial adverse impacts upon the Tribes. The Tribes oppose any relinquishment of land by the District to the State or to private parties, particularly where the land adjoins the Reservation. Moreover, the Tribes believe that some of the relinquished lands described above lie within the true and proper boundaries of the Reservation, which are located to the east of the eastern boundary which is designated on the RMP maps. At minimum, the Tribes should be consulted before any such transaction is carried out which so obviously and directly affects them.

4. CRIT Participation in District Planning and Management.

The Colorado River Indian Reservation, which lies entirely within the boundaries of the District, is the largest area in the District held by anyone other than BLM and the military. The Tribes control more riverfront land than anyone else in the District. (See, Map 6.) The Reservation adjoins or lies across the river from the Big Maria CRMP along its entire north-south stretch. And a large portion of the entire District is comprised of lands which are traditional tribal lands of historic, cultural and spiritual significance to members of the Tribes. For these reasons, the Tribes are greatly concerned with the District's planning and management actions. Virtually every aspect of the RMP has either direct or indirect impacts upon the Tribes and their Reservation.

4 Yet, the Tribes have in the past been permitted little voice in planning and management of the RMP. To date, the Tribes do not even have a voting representative on the District Advisory Committee, nor have they always received timely notice of the committee's meetings. Where the Tribes have had the opportunity to take a position on a District proposal, the District has frequently ignored the Tribes' position. While the Tribes appreciate the meetings they have had with District officials to inform them of the District's plans, they should be permitted greater voice at an earlier stage in the planning process.

5. Management Policies.

The RMP, like the Big Maria CRMP, is lacking in management policies which spell out exactly what kinds of uses would be permitted throughout the District under the preferred and other alternatives. For example, a number of terms are used for which the uses permitted need to be defined in the RMP in order for an assessment of the Plan to be possible. These include: "priority wildlife habitat," "special management prescriptions," "key wildlife habitat," and other terms. The RMP fails to describe what these terms mean and what specific policies and regulations would be in

5 effect in each area. Another example of this shortcoming is that the RMP states that cultural resources in 30% of the areas will be protected, but it does not specify precisely what protective measures are proposed and where, so that an assessment can be made whether the Plan will in fact provide adequate protection in even that limited area.

6. Coordination.

It is perplexing that the RMP does not refer to or even mention the Big Maria CRMP. If the CRMP is, as the District claims, its plan for protecting the cultural and archeological resources in the Big Marias, which include the most dense and most significant array of such sites anywhere in the District, then why was it not at least mentioned in the RMP? As a result of the RMP's failure to explain its relationship with the Big Maria CRMP, it is impossible to tell from the RMP the extent to which there are significant cultural resources in the District outside of the Big Marias, and the extent to which the RMP proposes to protect them. Apparently, the RMP proposes to attempt protection of only 30% of the total area of known high and moderate cultural resources sensitivity (RMP, p. 91). Whether or not the proposed protection measures would protect even that 30% is doubtful, given the shortcomings of the program proposed in the Big Maria CRMP.

6 Just as the Big Maria CRMP fails to coordinate with or discuss plans of the BLM Desert District, Bureau of Reclamation, and Caltrans, so the RMP has failed in these respects. For the same reasons that any program for protection of cultural resources depends upon joint action of these agencies, an overall management program involving all resources also relies upon inter-agency coordination and joint planning.

7. Cactus Plain Wilderness Area.

The Tribes support designation of Cactus Plain as a wilderness area. Such a designation would be consistent with the Tribes' recommendation that a four-mile buffer zone

Dennis Turowski
Bureau of Land Management
April 18, 1985
Page 7

be established on BLM land around the perimeter of the Reservation.

8. 1915 Land Withdrawal.

The RMP and associated maps show as District land approximately 60,000 acres of land in the La Paz area which was unlawfully withdrawn from the Reservation in 1915. As the Tribes have stated to the District previously, this land was improperly withdrawn and should be considered part of the Reservation rather than as land administered by the District.

9. Big Maria Area of Critical Environmental Concern.

7 The Tribes strongly endorse designation of an area of critical environmental concern in the Big Marias. The boundaries of this area should coincide with those of the Big Maria CRMP. Whether they do is impossible to discern from the RMP. The RMP also should clarify what restrictions are imposed as a result of the ACEC designation.

Very truly yours,

SHUTE, MIHALY & WEINBERGER

ALLETTA d'A. BELIN

Counsel for the Colorado River Indian Tribes

ADAB:jt

cc: Harry Laffoon
Pam Williams
Charles Lamb
Ron Moore

Mr. J. Darwin Snell
April 18, 1985
Page 2

Major Comments and Recommendations

1. Coordination with the Desert District.

As the Report and all the studies that have been done of cultural resources in the area make clear, the concentration of sites in the Big Marias does not end at the boundary between the Yuma District and the Desert District. Many of the significant sites in the Big Marias are located in the Desert District in the southwestern portion of the mountains.

It is imperative that there be agreement and coordination between the two districts as to the management of these cultural resources in order for any management plan to be effective. Absent such coordination, according to the Big Maria CRMP, the fencing of the resource area would abruptly end at the Desert District boundary. Not only would the resources in the Desert District be vulnerable to destruction, but ORVs and other human threats could obtain free access to the resources in the Yuma District through the unprotected Desert District.

Probably the most effective and efficient protection would be provided under management by only one district. To that end, perhaps the Yuma District could be designated the district with management responsibilities for all of the cultural resources in the Big Marias. Barring that possibility, the two districts should set up a mechanism for jointly managing the area. Absent such coordination, even the best program of the Yuma District would be undercut by an ineffective program or a delayed program on the part of the Desert District.

2. Management Policies Regarding Permitted Uses of the Lands Within and Adjacent to the Plan Area.

The Big Maria CRMP provides no guidance whatsoever regarding treatment of proposed uses in or adjacent to the management area by private parties and other public

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EXPRESS MAIL

April 18, 1985

Mr. J. Darwin Snell, District Manager
Bureau of Land Management
Yuma District Office
P.O. Box 5680
Yuma, AZ 85364-0697

Re: Comments on Draft Big Maria Cultural Resource Management Plan and Environmental Impact Report

Dear Mr. Snell:

Enclosed are comments submitted on behalf of the Colorado River Indian Tribes on the Draft Big Maria Cultural Resource Management Plan and Environmental Analysis Report ("Big Maria CRMP," "Report"). The Tribes have also submitted a copy of these comments as part of their comments upon the District's Draft Resource Management Plan and Environmental Impact Statement, which they are submitting to the District at this time under separate cover.

Introduction

The Yuma District's Draft Big Maria Cultural Resource Management Plan ("Big Maria CRMP," "Report") is an important first step towards longterm protection and management of the highly significant cultural resources in the Big Maria mountains. The Report's description of the history, significance and extent of the resources in the area is for the most part, very good. Such a description is, however, only the first step of a management plan. Where the Report falls down is in setting forth a full management plan, including budget, policies, and schedule, pursuant to which BLM will carry out its legal obligations to ensure the best possible protection of those resources. In the comments and recommendations set forth below, the Tribes attempt to describe the respects in which they believe the Big Maria CRMP is lacking and fails to provide the necessary guideposts for BLM to perform its legal duties with respect to these resources.

Mr. J. Darwin Snell
April 18, 1985
Page 3

agencies. It merely notes that the entire management area has been withdrawn from general public use by the Bureau of Reclamation, and that there are a number of existing permits and rights of way.

Land withdrawn by the BOR is not only open to any uses by the BOR, it is also available for many other uses. One of the most glaring omissions in the Report is any policies or other guidance for determining under what conditions use of the lands within the management area will be permitted. The two greatest sources of damage to the sites in question are ORVs and permitted uses of the lands, such as the roads and quarries constructed and used by the BOR, the powerline rights of way, and the communication tower sites on top of Black Point.

Ever since this draft Report was issued, the BOR has undertaken considerably more activity within the management area, some of which has destroyed or damaged significant sites. In connection with its proposed 450 unit residential development just south of Black Point, the River City Development Company has made plans to construct large dikes on BLM land for surface water dreinage. The dikes would be very close to significant cultural sites. And there are other private parties with mining claims who are free to pursue them without any apparent constraints.

The Big Maria CRMP should set forth comprehensive policies and priorities to govern such activities within the management area. Otherwise, any fencing, road closing, and other protective measures will be to no avail because the damage will come from permitted uses rather than ORVs. The plicies should set strict limits on what uses will be permitted within the management area and under what conditions. The policies should also include provision for phasing out existing uses where possible and where such uses pose a serious threat to the resources. For example, the communication towers at Black Point should be phased out as soon as possible as that area is one of great spiritual significance to Mojave Indians and its spirituality is gravely threatened by the towers. In addition, some of the trespass areas are dangerously close to significant sites.

While the Report mentions that removal of some or all of these trespassers would be necessary, it provides no schedule for their notification and removal, which should occur as soon as possible.

The policies should also address the situation where activities outside the management area have effects within the area. The proposed River City Development is a perfect example of why such policies are needed. Not only does BLM have to make a decision on the permit application to construct the dikes, but also the construction the development itself, with the resultant influx of people and ORVs would have a very substantial impact on the management area. The policies should seek adequate protection measures in connection with all activities outside the area that could have impacts within the area.

3. Enforcement

The enforcement provisions of the Report are sorely lacking. The sum total of enforcement seems to be a visit to each site every six months to see if damage has occurred At the same time, the Report recognizes that people remove signs, that they lift vehicles over fences, and that fencing and the other measures proposed will provide inadequate protection. Failure to provide a sound enforcement program is an admission that any program instituted by the District will serve at most to retard somewhat the inevitable destruction of the resources in the area.

The Tribes recognize that the District's Plan will be constrained by the funding available. This CRMP should, however, set forth a proposed enforcement program which could, if carried out, bring about large-scale compliance with the protection measures imposed in the area. Such an enforcement program would almost certainly include more significant patrols of the area and very strict controls over the extent to which permittees are allowed access to restricted roads and areas. It would also make provision for continuing evaluation of the Plan's effectiveness in protecting the resources, so that protection and enforcement

measures could be upgraded if necessary before too much damage is done.

The CRMP should also include a budget for the funds necessary to carry out such a program. There is no sense in designing and carrying out an entire protection program which omits an essential ingredient because of an anticipated budget squeeze. Once the entire program, including an adequate enforcement aspect, is designed, then priorities can be assigned to the various parts of the program and funds distributed accordingly. The District has put the cart before the horse in neglecting enforcement because of cost, and thereby recommending a program which is doomed to fail.

4. Land Swaps and Acquisition.

The Big Maria CRMP should include a program for land swaps and/or acquisition of areas of special significance. The Report mentions that many of the significant resources in the area, including part of Black Point, are on private land. It goes on to propose that the BLM acquire the Black Point land, yet it proposes no schedule or any specifics for such an acquisition. (Report, p. 16). Black Point, where the resources are highly significant and the owner has expressed interset in trading or selling the lands, is a situation ideal for land swapping or purchase. It is quite likely that there are other highly significant sites on private land which are also perfectly suited to purchase or trade.

The District should review all such potential situations, set them forth in order of priority and proceed with the transactions. The CRMP should include guidelines and schedules for such a program as well as a special fund to carry it out. As long as there are privately-owned lands in the area which contain significant resources, this program should be a high priority within the overall Management Plan, as it provides a mechanism for protecting resources for which, as long as they are in private hands, there is no guaranty of protection.

5. Advisory Management Committee.

The Big Maria CRMP should establish an advisory committee composed of members of the Tribes and experts knowledgeable about the cultural resources in the management area. Such a committee would review the draft Plan and make recommendations for it. The committee would also oversee the implementation of the Plan, and would be involved in any decisions revising the Plan itself or its implementation schedule. Such a committee would also be helpful in keeping the District informed of any developments pertinent to the Plan. The existence of such a committee would help shape an effective protection program and would aid in ensuring that nothing that the BLM did would further aggravate the existing problems. (For example, in the past when the BLM has built site-specific fencing without consulting Tribal members, such fencing has been constructed in a manner very disturbing to the spirituality of the sites in question.)

6. Time Schedule and Assurance of Completion of Protection Measures.

The Big Maria CRMP should include a schedule which designates when each aspect of the program will be begun and completed. This could resemble the schedule on p. 67 of the Report, but should be more complete. It should include not only additional aspects of the program not included in the draft Report, but also tasks mentioned in the Report but not included in the schedule, such as land acquisition and swapping.

The schedule for establishing protection measures in the management area must be tied to the actions that the BLM takes in connection with proposed uses of BLM or adjacent lands which uses could affect the resources. In other words, it is critical that no activities be permitted which could have a significant effect on any of the resources in question unless and until adequate protection measures are in place. As the Report itself makes clear, it takes but one residential development adjacent to BLM lands to lead to defacing ORV tracks over countless sites when, as is the situation now, there is no fencing or other protective

measure in place. All the fencing in the world won't make any difference if it is built after the damage is done.

The Report acknowledges that "the unprotected sites will require protection, or in a few years most will receive certain impacts from the ORV people." (Report, p. 54.) At the same time, the Report acknowledges that the District never implemented the major measures of the Activity Plan it prepared for the Blythe Intaglios. As noted, above, already in the seven months since the draft Report was issued, new uses have damaged and threatened to damage the resources. What assurance do the Tribes and the rest of the public have that any of the measures described in this Report will be implemented in time to save the resources or will ever be implemented? To provide some assurance that substantial additional damage will not occur in the interim until protection measures are established, the District should not grant any permits for uses that could affect the resources and should restrict to the greatest possible extent any other use potentially affecting the resources until an adequate protection plan is in effect.

Other Comments and Recommendations.

1. Environmental Assessment Record

Two deficiencies stand out in the EAR. First, in the section on alternatives, the only other alternative mentioned, except the no action alternative, is that of fencing individual sites. One viable alternative related to that which merits serious consideration is that of area fencing together with site specific fencing at particularly significant or sensitive sites. As the Report admits, area fencing will be only partially successful. If it is combined with site specific fencing on at least some sites it is more likely to be successful. Site specific fencing should be constructed with the help of Indian advisors, as in the past when the BLM has built such fencing, it has done so in a manner very disturbing to the spirituality of the areas involved. Also, Indian advisors could aid in determining which sites most needed protection.

Mr. J. Darwin Snell
April 18, 1985
Page 8

Also included for consideration would be an alternative which the District believes would do the best possible job of protecting the resources in question. The draft CRMP acknowledges that the measures proposed in it would only serve to delay the inevitable destruction of the resources. Either in the Plan itself, or as an alternative, the District should set forth a program which would protect the resources. Presumably such a plan would include a much more active enforcement program than that proposed in the draft Plan. The District should at least propose for consideration a Plan which would effectively carry out the BLM's objectives and its legal mandates. It should not, as it has done here, foreclose such a possibility at the outset by predetermining that it would be too expensive.

2. Area of Critical Environmental Concern

The Report mentions that the southern half of the management area is proposed to be managed as an Area of Critical Environmental Concern. It should explain what needs to be done to make that designation final, and on what timetable that will occur. It should further set forth what such a designation means with respect to BLM's management of the area, and how that relates to any plan to protect the area's cultural resources.

3. Site Inventory and Protection

The Report creates the impression that virtually all of area 6 A has already been adequately inventoried (that is, the cross-hatched area in map 5). Yet the Tribes are aware of a number of instances where additional sites, not mentioned in any of the existing inventories, have been located in the area. In fact most of the inventories of the area, including the von Werlhof study, are based almost exclusively on pre-existing studies. No one has yet completed a systematic and complete inventory of even that area which is marked as inventories in the Report. While the BLM may consider the costs of such a complete inventory prohibitive, the Report should explicitly acknowledge the shortcomings of the existing studies of the area.

Resolution No. R-122-84

RESOLUTION

COLORADO RIVER TRIBAL COUNCIL

A Resolution to Request the United States Bureau of Land Management (BLM) to maintain a four-mile open space buffer zone on lands managed by said Bureau adjacent to the Colorado River Indian Reservation

Be it resolved by the Tribal Council of the Colorado River Indian Tribes, in ~~regular~~ special meeting

assembled on October 12, 1984

WHEREAS, the Colorado River Indian Reservation was set aside by the United States as the permanent homeland of the Colorado River Indian Tribes; and

WHEREAS, the Colorado River Indian Tribes or their predecessors have resided as a constant population in the area covered by the Colorado River Indian Reservation since time immemorial; and

WHEREAS, the Colorado River Indian Tribes have cultural and spiritual concerns on the lands adjacent to the Reservation because the current Reservation boundaries do not reflect the true extent of traditional boundaries; and

WHEREAS, activities on lands adjacent to the Colorado River Indian Reservation have a direct effect on the Reservation and the members of the Colorado River Indian Tribes; and

WHEREAS, the Colorado River Indian Tribes are experiencing law enforcement and other problems in areas of the Reservation abutting heavily developed off reservation lands; and

WHEREAS, the problems caused by such development are inescapable absent total closure of the Reservation boundaries; and

The foregoing resolution was on October 12, 1984 duly approved by a vote of 6 for and 0 against, by the Tribal Council of the Colorado River Indian Tribes, pursuant to authority vested in it by Section 1.a. Article VI of the Constitution and By laws of the Tribes, ratified by the Tribes on March 1, 1975 and approved by the Secretary of the Interior on May 29, 1975, pursuant to Section 16 of the Act of June 18, 1934, (48 Stat. 984). This resolution is effective as of the date of its adoption.

COLORADO RIVER TRIBAL COUNCIL

By Anthony Drennan Sr.
Chairman

Elliot L Boot
Secretary

Mr. J. Darwin Snell
April 18, 1985
Page 9

In addition, the Report focuses almost exclusively on geoglyphs as opposed to any of the many other kinds of sites. It is imperative that the other sites also be adequately inventoried and protected, and where appropriate, nominated for inclusion on the National Register of Historic Places. In many instances, other sites may be of equal significance to the geoglyphs.

Very truly yours,

SHUTE, MIHALY & WEINBERGER

Alletta Belin

ALLETTA d'A. BELIN

Counsel for Colorado River Indian Tribes

cc: Harry Laffoon
Pam Williams
Ron Moore
Charles Lamb

RESOLUTION NO. R-122-84
OCTOBER 12, 1984
PAGE 2

WHEREAS, further development on the boundaries of the Reservation would result in an unmanageable increase in the burden on law enforcement and other regulatory systems of the Colorado River Indian Reservation; and

WHEREAS, further development on the boundaries of the Reservation runs a substantial risk of being inconsistent and incompatible with the developmental plans of the Colorado River Indian Tribes; and

WHEREAS, present Bureau of Land Management land management plans, cpolicies and actions do not give primary consideration to the effects of those plans, policies and actions on adjacent Colorado River Indian Reservation lands; and

WHEREAS, a four-mile open space buffer zone on lands managed by the Bureau of Land Management adjacent to the Colorado River Indian Reservation would maintain the status quo on the Reservation, prevent further burdens on Tribal government, and protect the cultural, spiritual and economic concerns of the Colorado River Indian Tribes;

NOW, THEREFORE, BE IT RESOLVED that the Colorado River Indian Tribes hereby request that the United States Bureau of Land Management maintain a four (4) mile open space buffer zone on lands managed by said Bureau adjacent to the Colorado River Indian Reservation.

263

La Paz County Board of Supervisors

1301 ARIZONA AVENUE, SUITE 6
POST OFFICE BOX C
PARKER, ARIZONA 85344
(602) 669-6115

RECEIVED BLM DISTRICT APR 22 3 [illegible] '85 YUMA, ARIZONA

MARYETTA TSOSIE
DISTRICT #1
DONALD D. DENTON
DISTRICT #2
WAYNE SWEETLAND
DISTRICT #3
NETA J. BOWMAN
CLERK/COUNTY MANAGER

April 17, 1985

J. Darwin Snell, District Manager
Bureau of Land Management
Yuma District Office
P.O. BOX 5680
Yuma, Arizona 85364-0697

Re: 1601 (YDO)

Dear Mr. Snell:

1 La Paz County has reviewed the draft RMP-EIS for the Yuma District planning area and would like to propose that an alignment change of the SCORE Parker 400 race course be made. The maintenance which the County must do after the race is very extensive on the County roads which the course now covers.

The course at present utilizes approximately 35 miles of County roads. The new proposed course which has been driven and flagged by Sal Fish of SCORE and Wayne Arrington of the La Paz County Public Works Department is shown in red on the attached map.

We believe that this change would be very beneficial to all and La Paz County through the Public Works Department will assist to effect this change if the determination is in favor of it.

This would create a permanent course for this race which would be utilized in the years to come.

We appreciate the opportunity to render to you for your consideration this proposal.

Sincerely,

Donald D. Denton, Chairman
La Paz County Board of Supervisors

264

YUMA DISTRICT BLM

YUMA , AZ.

DEAR SIRS:

MY NAME IS DARYL ROMEYN AND I WOULD LIKE TO COMMENT ON YOUR DISTRICT MANAGEMENT PLAN FOR THE OFFICIAL RECORD. I SUPPORT ALTERNATIVE D AS THE MOST BENEFICIAL USE OF THE PUBLIC LNADS. UNDER THIS ALTERNATIVE TRUE BALANCE IS STRUCK IN THE PRESERVATION OF DESERT MOUNTAIN COUNTRY THAT IS IMPORTANT FOR AESHETIC VALUES, WILDLIFE, AND RECREATION...AND THE VALUE OF ROADLESS LAND WILL CONTINUE TO INCREASE IN THE FUTURE AS MORE PEOPLE TAKE TO THE HILLS. I SPENT SOME TIME IN THE MAZATZAL MOUNTAINS BY PAYSON SEVEERAL YEARS AGO AND LIKED IT VERY MUCH. THE LOW DESERT OF THE YUMA PROVIDES ALOT OF CHALLENGING OPPORTUNITIES WE DONT SEE UP HERE IN WASHINGTON. UNDER THE PREFFERED ALTERNATIVE, ONLY 4 PERCENT OF THE LAND IN THE DISTRICT IS PRESERVED AS WILDERNESS FOR THE FUTRE. VERY LOW ,,,VERY LOW. OUT OF ALL THAT COUNTRY..YOU CAN ONLY FIND 4 PERCENT THAT SHOULD BE SAVED....I DONT THINK 96PERCENT FOR WHATEVEER AND ONLY 4 PERCENT FOR WILDERNESS IS BALNACED OR AT ALL FAIR. HOW WOULD THE MINERS LIKE IT IF IT WERE THE OTHER WAY AROUND.

ALTERNATIVE D PRESENTS A MORE EQUITABLE ALLOCATION OF LAND USE. 11PERCENT SAVED FOR THE FUTURE AND WILDLIFE. IT ADDS THE MAJOR DISPUTED AREAS CROSSMAN PEAK , scenic backdrop for lake havasu, MUGGINS MTN AND THE EAST CACTUS PLAIN. IF YOU AMEND THE PREFFERED ALTERNATIVE TO INCLUDE THESE,,,I COULD SUPORT IT. JUST THINK, UNDER D AND THE 11 PERCENT OF THE DISRICT TO WILDERNESS..FOR EVERY 9 PIECES OF PIE DEVELOPERS AND MINERS AND WHOEVER ELSE WNATS TO USE THE PUBLIC LNAD FOR ALMOS ANYTHING, GET ONE PIECE. IN MOST GAMES 50-50 is fair BUT I'LL SETTLE FOR.....OVER PLEASE

ALTERNATIVE D..I FEEL IT PRESERVES THE BEST OF THE YUMA DISTRICT AND CAN MEET THE OTHER USES THAT WERE DESIRE AND REQUIRE.

THANKS FOR TAKING MY COMMENTS INTO CONSIDERATION.

SINCERELY,

DARYL ROMEYN

DARYL ROMEYN
RT. 3 Box 3659
Selah, Wash 98942

265

ARIZONA MINING ASSOCIATION

C.J. HANSEN
President

April 19, 1985

J. Darwin Snell
District Manager
3150 Winsor Avenue
P.O. Box 5680
Yuma, Arizona 85364

Dear Mr. Snell:

Enclosed are comments of the Arizona Mining Association regarding the draft Resource Management Plan and Environmental Impact Statement for the Yuma District Planning Area.

The Arizona Mining Association represents 15 of the major mining companies that produce most the copper, molybdenum, silver and gold in the state. We are pleased that you will consider our oral comments and the enclosed comments in preparing the final Resource Management Plan and Environmental Impact Statement.

Sincerely,

R. J. Pursley
Executive Secretary

RJP/jc

2702 N. Third Street · Suite 2015 · Phoenix, Arizona 85004 · (602) 266-4416

COMMENTS OF
THE ARIZONA MINING ASSOCIATION
ON THE
BUREAU OF LAND MANAGEMENT
YUMA DISTRICT DRAFT
RESOURCE MANAGEMENT PLAN/
WILDERNESS ENVIRONMENTAL IMPACT STATEMENT

Prepared by
the Lands Subcommittee
of the
Arizona Mining Association
Phoenix, Arizona

COMMENTS OF
THE ARIZONA MINING ASSOCIATION
ON THE
BUREAU OF LAND MANAGEMENT
YUMA DISTRICT DRAFT
RESOURCE MANAGEMENT PLAN/
WILDERNESS ENVIRONMENTAL IMPACT STATEMENT

INTRODUCTION

The Arizona Mining Association has developed these comments to generally show the concern for mineral potential within the Bureau of Land Management's Yuma District that is being studied for wilderness designation. The Arizona Mining Association consists of 16 major mining companies in Arizona that produce most of the copper, gold, silver and molybdenum in the State. We, as well as the aware public and the mining industry, are concerned about the continuing actions of the federal government to remove and restrict public lands from productive use prior to a thorough evaluation of the mineral potential of the areas being withdrawn.

Cumulative Effect of Withdrawals in Arizona

The Arizona Mining Association is extremely concerned about the continuing actions of the federal government to remove and restrict public lands from productive use. Approximately two-thirds of all public lands in the United States are now effectively withdrawn from mineral development. In Arizona, existing wilderness areas total 2,000,000 acres and it has been determined that approximately 30 million additional acres (two-thirds of the Federal lands in Arizona) are unavailable or highly restricted to mineral resource development by other withdrawals including BLM Wilderness Study Areas, Forest Service Wilderness Study Areas, Primitive Areas, Scenic Areas, Game Preserves and Refuges, Parks and Monuments, Defense Department withdrawals, Indian Reservations and numerous other withdrawals. Each of these categories has been formed by individual withdrawal actions with little or no consideration

1 to the cumulative effect of all withdrawals in Arizona. The Association feels this cumulative effect must be addressed and considered in this EIS.

Yuma District RMP

The draft Yuma District Resource Management Plan and Environmental Impact Statement (RMP) has been reviewed by the Arizona Mining Association primarily to identify those proposed land management actions that would withdraw lands from mineral entry or otherwise restrict mineral development. Listed below are the major management decisions which would have an impact on mineral development.

Wilderness Area

There are presently 18 Wilderness Study Areas (WSA) in the Yuma district comprising a total of 205,105 acres. Of this amount, the RMP proposes to designate as wilderness 51,510 acres in two WSAs. Additionally, the plan proposes that an additional 980 acres be designated as wilderness by transferring the land to the United States Fish and Wildlife Service (USFWS) for addition to a proposed USFWS National Wildlife Refuge Wilderness Area. There are no existing wilderness areas in the Yuma district although 275,000 acres in the district, comprising approximately 23% of the total public lands, are subject to Bureau of Reclamation withdrawals. The RMP also states that an additional 4,110 acres of land within the district boundary and administered by the USFWS have been recommended for wilderness.

Of the two WSAs recommended for wilderness designation, the Chemehuevi/Needles (5-4) WSA is comprised only of 960 acres and is dependent on adjoining lands in the Havasu National Wildlife Refuge and the Chemehuevi Mountains WSA, in the BLM's California Desert District, being designated as wilderness. The Arizona Mining Association does not believe that it is

appropriate to consider parcels of such small size for Wilderness designation.

A total of 50,550 acres in the Cactus Plain WSA has been recommended for wilderness designation. The RMP reports past mining activity for barite and fluorite in the southern portion of the WSA. The Geology, Energy, and Minerals (GEM) assessment for this WSA also reports moderate potential for non-metallic mineralization in this same area. The GEM assessment for the remainder of the WSA reports low potential for uranium. Some of the land in the southern portion of this WSA is not recommended for wilderness. It is not clear, however, whether this area includes all the lands listed in the GEM assessment as having moderate potential for non-metallic mineralization.

Special Management Areas

The RMP proposes 33 cultural resource sites totalling 6,800 acres for management under the "Conservation for Future Use" category which means essentially that the lands will be preserved in place. Approximately 6,000 acres, or 88% of the land included in these areas, are presently subject to Bureau of Reclamation withdrawals. For the remaining 800 acres that is not withdrawn from mineral entry the plan notes that "mining activity on the remaining sites would be managed so as to avoid disruption or, where this is not possible, minimize damage to cultural values." p. 14. Within these cultural resource sites no surface occupancy for oil and gas leases would be allowed, no sand and gravel permits would be issued and no utility rights-of-way would be permitted.

The RMP also designates two special management areas: a natural scenic area comprising 26,080 acres and an Area of Critical Environmental Concern (ACEC) totalling 5,280 acres. All lands within the ACEC would be withdrawn from mineral entry and leasing. However, it appears from the RMP that at least a portion of these lands is presently subject to a Bureau of Reclamation withdrawal. In the proposed natural scenic area

the plan provides that improvements would be restricted to those compatible with the natural or cultural resources for which the area is recognized and to those permitted by the mining laws.

In addition to the two designated special management areas, there are five other areas not formally designated but which would be managed under special prescriptions to protect their natural values. These five areas include a total of 149,905 acres. As with the natural scenic area, the plan provides that improvements would be restricted to those compatible with the natural or cultural resources for which the area is recognized and those permitted by the mining laws. Almost all of the land within the two designated and five other areas not formally designated as special management areas, is comprised of lands included in WSAs within the district.

Priority Wildlife Habitat Areas

The RMP designates a total of 249,640 acres as priority wildlife habitat areas. According to the plan, improvements in these areas will be restricted to those compatible with wildlife habitat or cultural resources and those required by mining. No sand or gravel permits would be authorized but surface occupancy under oil and gas leases would be allowed except for 11,100 acres of big horn sheep lambing grounds and approximately 40 acres of land adjacent to springs. Additionally, roads in the 11,100 acre big horn sheep lambing ground would be closed for six months (January 1 - June 30) each year. The plan specifically notes that the road closures could impede mineral exploration in the area because these lands have high mineral potential. However, according to the RMP, development "would not be impacted because mining on the approximately 50 mining claims that currently exist on the lambing grounds, as well as the mining of any new deposits which would be discovered, would be allowed." p. 91. The Association is concerned that it is not clear whether the RMP unrealistically assumes that mining can continue for six months without using

2

2 access roads to the mine site or whether the statement recognizes the right of a mining claimant to have access to his claims. This should be clarified in the final RMP to provide that claimants would have year round access to their mining claims located within the lambing grounds.

General Comments

1. The RMP does not take a definite stand on management of the WSAs not recommended for wilderness. At p. 11 of the RMP it states that "[a]reas reviewed by Congress but not added to the National Wilderness Preservation System would be managed in accordance with other applicable guidance provided by this RMP." Later in the RMP, under Item No. 18 on p. 80, it states that lands recommended as unsuitable for wilderness preservation would "eventually" be released from further wilderness consideration and returned to multiple use management or other uses indicated in the RMP. For those WSAs not recommended for wilderness and that are not included in a Special Management Area, Priority Wildlife Habitat Area or Area of Critical Environmental Concern, the RMP lacks guidance for future land management. The Association's position is that those WSA lands not recommended for wilderness or other special use areas be immediately returned to multiple use management.

2. The RMP states that, under the preferred alternative plan being recommended, only 4% of the BLM managed lands would be recommended for wilderness designation. p. 22. The Arizona Mining Association believes this figure is very deceiving in that it seems to downplay the large number of lands in the Yuma District withdrawn from mining or on which future restrictions on mining can be expected. In addition to the 51,510 acres proposed for wilderness, the RMP also proposes to transfer 980 acres to the USFWS for wilderness, 5,280 acres will be withdrawn under an Area of Critical Environmental Concern, 4,110 acres of USFWS

administered land have been recommended for wilderness and there currently exists 275,000 acres within the district that are subject to Bureau of Reclamation withdrawals. These figures add up to a total of 336,880 acres which comprises approximately 28% of the total (1.2 million acres) public lands administered within the Yuma District. In addition to these withdrawals, there are 426,425 acres of land, including cultural resource sites, scenic area, lands managed under special restrictions and priority wildlife habitat areas, on which there will be land management restrictions. Although the RMP provides that mining will be permitted in these latter areas it is quite likely, as a practical matter, that approval of plans of operations will be more difficult to obtain without numerous and perhaps onerous restrictions being placed upon the mine operator. The total of the withdrawn lands and the restricted use lands within the Yuma District equals 763,305 acres, or approximately 64% of the total land administered by the District.

3

3. In table 4-1 on p. 81 of the RMP it provides that mining is an unauthorized activity within cultural resource sites. This is true only for those proposed cultural resources sites presently subject to withdrawals. However, the RMP states that 800 acres of the 6,800 acres proposed for cultural resource sites will continue to be available to mining. Therefore, the reference to mining as an unauthorized activity on p. 81 should either be deleted or it should be explained that only mining in withdrawal areas is prohibited, except for valid rights acquired in the withdrawn areas prior to the date of withdrawal.

4

4. The RMP is deficient in not reviewing the appropriateness of the 275,000 acres of land within the district that is presently subject to Bureau of Reclamation withdrawals. According to the Federal Land Policy and Management Act

5

(FLPMA), the Secretary of the Interior is to develop land use plans for all public lands regardless of whether the lands previously have been withdrawn. FLPMA, § 202(a). Additionally, there is inadequate consideration given in the RMP to the combined effect of the Bureau of Reclamation withdrawals and those additional withdrawals proposed in the RMP.

Arizona: Mineral Storehouse

Arizona is a mineral storehouse and plays a significant role of meeting the nation's mineral needs. For many years, Arizona has been the premier metal producing state in the nation, and Arizona's mining industry produces two-thirds of the nation's newly mined copper, one-quarter of the nation's molybdenum, one-fifth of the nation's silver and over one-tenth of the nation's gold.

Not only is Arizona the mainstay of the nation's mineral storehouse now, it also will be relied upon heavily in the future to provide a large portion of the United States' copper, molybdenum, silver and gold. The U.S. Bureau of Mines has reported that Arizona contains 85% of the United States' copper reserves and 20% of its molybdenum reserves, as forecast well into the 21st century. As a result, the state will play a significant role of meeting the nation's mineral and energy independence goals in the future and it is expected that mining will continue to be a prominent force in the future growth of the state's economy. However, discovery and development of many of these resources is dependent upon access to federally-controlled lands (70% of the state) where these minerals often occur. And unfortunately, minerals in Arizona have seldom received serious or timely consideration in land use planning.

A large number of small past producing mines and mineral prospects have occurred in or near the wilderness study areas considered in the Yuma District Draft RMP/EIS. A common exploration technique for copper, gold and silver has been in

use for the past three decades: evaluation of areas of high concentrations of small mines and prospects. Up to this time, all major copper ore bodies in Arizona, except for ASARCO's Sacaton Mine near Casa Grande, reflect the results of thorough and sometimes deep exploration of areas where mineralization in numerous small mines were already known to exist. In some instances, old mining districts hold a high probability of having a deep buried "heart" of copper ore somewhere within or near them. The same criteria has and is being utilized in exploring for major gold and silver deposits.

Recent technological breakthroughs in the processing of low-grade gold and silver ore through particle agglomeration and heap leaching have made these methods attractive alternatives for many small gold and silver deposits and prospects. Some low-grade gold and silver ores, old mine dumps and tailings previously regarded as uneconomic can be profitably developed using agglomeration pre-treatment and heap leaching. This is the process whereby clay and silt size particles are made to adhere to larger particles or made to accumulate into larger particles by the addition of moisture and usually a cementing agent through the application of some form of mechanical action. Cost comparisons with conventional processes show agglomeration and heap leaching to have a lower capital cost, a lower operating cost and a significantly lower discounted cash flow rate of return (DCF-ROR) than most other previously considered extraction processes for small mines and mineral prospects.

Beyond distinct economic advantages, gold and/or silver agglomeration and heap leaching require less lead time for production, offer greater design flexibility and have major environmental advantages. These and other attributes of the processes have been confirmed by rapid acceptance and utilization of agglomeration and heap leaching throughout the United States' precious metal mining industry.

Most of the high-grade deposits of gold and silver in the western United States were mined out by the 1930s. Thus, when the price of gold dramatically increased in the mid-1970s, the industry sought methods of economically developing lower grade deposits and reprocessing tailings from mills which treated higher grade ores. Heap leaching of these materials using cyanide and a lixiviant gained wide acceptance in the industry and proved, at least in some cases, to be a viable alternative to conventional milling and agitation leaching.

Most of the testwork which led the mining industry to use heap leaching was done by the U.S. Bureau of Mines at its Metallurgical Research Center in Reno, Nevada. The first major full-scale use of heap leaching of gold ore began in 1977 at the Smokey Valley Mine in Round Mountain, Nevada. Following Smokey Valley's example, a number of smaller gold-silver heap leach operations were initiated in the late 1970s mostly in Nevada and Arizona. More than half of these projects proved to be economic failures, due to poor metal recovery resulting from permeability problems in the ore heaps. As a result, the U.S. Bureau of Mines began research in 1978 to improve and sustain heap leach ore permeability. These efforts resulted in the development of the new particle agglomeration pre-treatment technology.

Precious metal producers in the United States quickly recognized the merits of agglomeration pre-treatment for heap leaching. In addition to a number of smaller operations, the process has been successfully applied by Tombstone Exploration, Inc. at their silver mine in Tombstone, Arizona. This was a past producer (State of the Maine Mine) that is similar in size to many of those gold and silver mines within and immediately surrounding the Yuma District. As a result of the above developing technology, the Arizona Mining Association believes that many of the past producing small mines and mineral prospects in the Yuma District may be economically viable mining

projects that can be undertaken by both large companies and small groups of entrepreneurs in the near future.

Arizona Mineral Occurrences within the Yuma BLM Districts

Base and Precious Metals (Figure 1)

Arizona ranks second in the nation in the annual production of silver and fourth in the annual production of gold. The major economic development and cultural growth which occurred in Arizona since the Gadsden Purchase of 1853 and since it became a territory in 1863 can be directly attributed largely to the natural wealth of mineral resources, especially gold and silver, that abound in the state. It was the discovery of placer gold deposits, beginning in 1857, along the Lower Colorado River within the BLM's Yuma District, that attracted prospectors to the Arizona region in large numbers. It started with the Gila City placers about 20 miles east of Yuma and a series of gold rich placers that were located north of Yuma between 1861 and 1864. About the same time, gold placers were discovered near Lynx Creek and at Weaver and Rich Hill in Yavapai County. Mining operations also began in 1863 at the rich gold deposit of the Vulture Mine which started the town of Wickenburg.

Due to the meteoric rise in the price of gold and silver since 1978 a number of gold and silver mines have reopened in Arizona. Most notable gold deposit is the Congress Mine operated by Congress Consolidated Gold Mines in Yavapai County. Additional small past-producing gold mines are expected to reopen as a more favorable economic climate develops. The mineral community is excited by the recent information that a large low-grade gold deposit has been identified 15 miles northwest of Phoenix. As a result, exploration activity is expected to increase in this area for this type of gold deposit. The Association realizes that the dropping price of gold and silver substantially impact on this exploration and

development potential. However, this is a short lived phenomena and when prices recover exploration activity will increase.

A number of silver mines also have reopened in Arizona since 1978 and many other mines with significant past production are being re-evaluated. Recent reopened mines include Gunslinger, McCracken, Silver Cross, Contention, Blue Top, State of Maine and Ash Peak.

Figure 1 shows the occurrence of base and precious metals (gold, silver, copper, lead, and zinc) production in Arizona. As can be ascertained from the figure, there is a specific mineral belt in which these deposits occur. A major concern of the Arizona Mining Association is that these restrictions will not allow the systematic evaluation of subsurface resources within the Yuma District. With a number of recent gold and silver discoveries and mine developments occurring near the California-Arizona border such as the Picacho, Potholes, Fortuna, Mesquite and Cargo gold deposits and the silver deposits of Sheep Tanks and the Silver District near the Imperial National Wildlife Refuge, the Association believes we can ill afford to withdraw or restrict these lands prior to a thorough mineral evaluation. As Joe Wilkins, Jr. of St. Joe American Corporation states in his treatise on The Distribution of Gold- and Silver-bearing Deposits in the Basin and Range Province, Western United States, "the overall spatial and temporal distribution of (gold and silver) deposits within the Mohave Block (the area in which the Yuma BLM district occurs) may not represent an absence of mineralization or an inadequacy of other geologic contents, but may be artificially induced by the vast tracts of lands withdrawn from mineral entry." (See Figures 2 and 3, and Table 1.)

6

Crossman Peak 5-7B (See Figures 1, 4, 5, 6, 7, and 8)

Crossman Peak, Swansea, Gibraltar Mountain, Cactus Plain and East Cactus Plain all occur within or adjacent to the Whipple - Rawhide - Buckskin - Moon Mountain - Plamosa

extensional terrane which contains numerous copper and gold occurrences, mines with historic production and ongoing deposit definition. Crossman Peak is known to host lode base and precious metal occurrences; tungsten and copper occur in panned stream sediment samples in concentrations up to approximately 1000 ppm. The Swansea area comprises numerous Cu, Ag ± Au mines hosted by regionally extensive structures which control mineralization and which are considered to be prospective sites for future discovery.

In the western one-half of Section 19, T14N, R18W a fairly strong vein occurs striking N45°E, dipping 45°NW in which a drift was driven for approximately 100 feet. Two samples cut across the vein for 1.5 feet and 5 feet, and assayed 0.66% copper, 0.015 ounces per ton gold, and 2.70 opt silver and 0.02% copper, 0.25% lead, 0.05% zinc, 0.005 opt gold and 0.60 opt silver. This quartz vein ranges from 3 ft. to 10 ft. in width. Mineralization consists of pyrite, galena and copper.

In addition, numerous mining companies have ongoing reconnaissance programs covering the area encompassing Crossman Peak WSA because their research indicates that the area is in a geologically favorable setting that can contain mineral deposits that are potentially economic. Two areas in particular show substantial possibilities for gold, silver, lead and copper mineralization as shown on Figure 7.

The Association recommends that this area be removed from further consideration for wilderness due to its significant mineral potential.

Gibraltar Mountain 5-12 (See Figures 1, 4, 5, 5, 9 and 13)

Section 34, T10N, R18W contains the old Mammon Mine and respective workings. The area has significant potential for copper and gold deposits.

At this time, the Association cannot take a firm position on these units. Additional studies will be necessary.

Swansea 5-15A (See Figures 1, 4, 5, 6, 12 and 13)

This WSA has excellent mineral potential with many exposures of mineralization including gold, copper, lead, zinc and silver.

This area has definite mineral possibilities. It is bordered to the southeast by the Swansea Mine, to the southwest by the Planet Mine, to the northwest by the Mineral Hill Mine, and to the north by the Cleopatra and Green Dragon Mines. The Swansea, Plant, and Mineral Hill properties have all produced significant amounts of copper, and their extensions into the proposed wilderness area present several prime exploration targets.

At the Mineral Hill Mine property right on the northeast edge of the WSA, there exists fairly extensive and widespread oxide copper and specularite mineralization. A few years ago this ore was partially mined and leached in large tanks which still exist at the mine.

On the southeast edge of the WSA the old Swansea mine is apparent. It still has some future potential as a producer. The Swansea shafts are within one and one-half miles of the WSA boundary.

On the east side of the WSA in Sections 16 and 21, T10N, R15W an old existing road crosses the width of the WSA.

A member company currently holds valid Federal unpatented lode mining claims in Sections 5 and 8, T10N, R16W entirely within the Swansea 5-15A Wilderness Study Area. They have done extensive exploration work in this area for the past 18 months and will probably correlate additional work in 1985. In addition, the mining company holds other varied claims in

Many mining companies have examined several properties which are located within a radius of five miles to the northwest, including the Carnation, Billy Mack, Rio Vista, and Capilano mines. Mineralization as noted is in the form of chrysocolla and specularite together with traces of gold and silver. Assays range in value from .33% to 6.90% copper.

Chrysocolla and traces of silver may be seen along faults within the Paleozoic - Mesozoic limestones at the old Rio Vista mine roughly one and one-half miles northwest of the WSA in Section 26, T10N, R19W. There are several other old mines (6) from two to four miles north of the WSA. The ore deposits consist of small, pockety bodies with chrysocolla, malachite and specularite with which flaky gold sometimes is associated.

Figures 4, 5 and 6 indicate the presence of iron, copper and gold mineralization.

The Association recommends that this area be removed from further consideration for wilderness due to its significant mineral potential in the northern portion of the WSA and due to the small size of the parcel after excluding the high mineral potential area.

Cactus Plain 5-14 A/B and East Cactus Plain 5-17 (See Figures 1, 4, 5, 6, 10, 11 and 13)

The area has shows of iron, beryllium, copper and gold as indicated on Figures 4, 5 and 6. It also occurs within Arizona's highly mineralization precious metal zone. However, due to the paucity of outcrops a thorough evaluation of this WSA could not be conducted.

This area, located to the north of Bouse, shows numerous old workings which were prospected for gold. Work carried out by member company geologists on the Little Butte Gold Mines property indicated potential for a significant tonnage of mineralized material grading up to .09 opt Au.

Sections 6 and 7, T10N, R16W, and in Sections 1, 2, 11, 12, T10N, R17W immediately west of the proposed Wilderness Study Area.

Figure 12 shows the zones of excellent mineral potential within and contiguous to the unit. Figures 4, 5 and 6 also show the occurrence of substantial mineral potential.

The Association recommends that this area be removed from further consideration for wilderness due to its substantial mineral potential.

Trigo Mountains 5-23B and South Trigo Mountains 5-23A (See Figures 1, 4, 5, 6, 14, 15 and 17)

The Trigo Mountains WSA is located north of the well defined Silver District, including the Clip, Black Rock and Red Cloud historic producers. Extensive drilling programs in the early 1970s outlined open pittable reserves in excess of 5 million tons with an average approximate grade of 4 opt Ag and significant flourite, barite, lead and zinc. The mineralization occurs along the contact between Tertiary volcanic rocks and basement metamorphic rocks. The structures which control the mineralization trend north-south into the WSA where similar geologic environments prevail making this ground prospective for mineral development.

Gulf and Western Resources conducted a substantial amount of work in the Silver Mining District near the east boundary of the Trigo Mountains study area where Gulf and Western developed a significant tonnage of open pittable material with low-grade silver, and lead values along the mineralized vein outcrop crossing the Black Rock, Pacific, Red Cloud, and Silver Glance claims. Published data on this development lists 6,000,000 tons at an average grade of 4.5 opt ag, along with values in barium, lead, and zinc.

Under better economic conditions the Silver Mining District could develop into an important deposit which would conflict with the wilderness study boundaries. There also is potential for other important deposits to be developed within the study area.

At the Black Rock mine on the northeast boundary of unit 5-23A the vein material, which strikes southwest-northeast, and dips southeast, varies in width from 6 ft. to 10 ft. This strike should trend across the WSA. One sample taken by him assayed 6.5 opt silver and 0.15% lead.

Reportedly an average of 16 samples at the Black Rock mine workings was 7 opt silver and 4% lead. The main ledge strikes northwest and dips northeast.

At the Red Cloud mine, also adjacent to the northeast boundary of the WSA the ore vein trends north 15° east and dips 45° to 55° to the east. It was up to 25 feet wide. Assays of ore from the vein averaged from 8 to 13.5 opt silver and 0.20% to 1.30% lead. There was a shaft at the Red Cloud mine 450 feet deep.

Figures 4, 5 and 6 show substantial mineral potential occurring within the two WSAs. Figures 14 and 15 also show a large number of old mines and prospects and zones of high mineral potential. The Arizona Mining Association recommends deletion of these two units (Trigo Mountains 5-23B and South Trigo Mountains 5-23A) from further wilderness consideration due to their significant mineral potential.

Kofa Unit 3 5-31 and Kofa Unit 4 533 (See Figures 16 and 17)

The Arizona Mining Association believes that these two WSAs are too small to be seriously considered for wilderness designation. They are substantially below the 5,000 acre minimum. We therefore recommend that they be deleted from further consideration in the BLM wilderness inventory program.

266

BRUCE BABBITT
GOVERNOR

Arizona
State Land Department
1624 WEST ADAMS
PHOENIX, ARIZONA 85007

R. K. LANE
STATE LAND COMMISSIONER

April 1, 1985

Mr. J. Darwin Snell
District Manager, Yuma District
United States Bureau of Land
Management
Post Office Box 5680
Yuma, Arizona 85364-0697

Dear Mr. Snell:

This is to confirm for the record the Land Department's comments on the Yuma District Resource Management Plan and Environmental Impact Statement that were discussed in our several meetings on the Plan.

The Land Department is willing to transfer to BLM most or all of the State sections that you have identified for acquisition. There are several parcels we may want to retain for possible future development, and we will discuss the specifics with you during a follow-up meeting, which we will try to schedule with you sometime within the next several months.

We are interested in acquiring most of the public lands in your proposed disposal areas, and will plan to identify these lands in that meeting.

Our only request for significant modification of the Plan relates to the Pittsburg Point area and the issue of retention and management of lands occupied by recreation concessions or leases. As you know, we want to acquire about 1150 acres in the Pittsburg Point area at Lake Havasu City that are currently under long-term lease to the State Parks Board and its sublessees and concessionaires. We ask that the Preferred Alternative be modified to provide for transfer of this land to the State.

We appreciate the opportunity to review this comprehensive planning document, and look forward to completing the land exchange transactions that will be of significant mutual benefits to the management objectives of our two agencies.

Sincerely,

Robert K. Lane
State Land Commissioner

cc: Arizona State Clearinghouse
1700 West Washington Street, Room 505
Phoenix, Arizona 85007

Muggins Mountains 5-53A (See Figures 1, 4, 5, 6 and 18)

The Muggins Mountains unit has significant potential for stratabound Uranium deposits, especially on the eastern and central portions of the unit.

The Muggins Mountains lie on the border of a regionally extensive terrane of basement metamorphics and tertiary volcanics cut by extensional faults known to host significant gold reserves further to the west in California. The Muggins contain and are adjacent to significant U, Au, and copper occurrences with some past production and are considered prospective mostly on the basis of their geologic coherency with terranes hosting large open pittable gold deposits to the west.

The Arizona Mining Association recommends that this unit be deleted from further consideration for wilderness designation.

We appreciate the opportunity to submit our written comments on the Yuma District Draft Resource Management Plan and Wilderness Environmental Impact Statement.

BRUCE BABBITT
GOVERNOR

Arizona
State Land Department
1624 WEST ADAMS
PHOENIX, ARIZONA 85007

R. K. LANE
STATE LAND COMMISSIONER

April 17, 1985

Mr. J. Darwin Snell
Manager, Yuma District
United States Bureau of
Land Management
Post Office Box 5680
Yuma, Arizona 85364-0697

Dear Mr. Snell:

This is to supplement our April 1, 1985 letter, a copy of which is attached, which commented on the Yuma District Resource Management Plan and Environmental Impact Statement.

We have made a further review of disposal areas in preparation for our meeting with you and your staff, to get our land exchange program underway in your District. We want to suggest that you reconsider your proposal to dispose of the BLM lands in disposal area D-9. The BLM lands in this area are nearly surrounded by 6 State sections, which were acquired from BLM in the 1969-1970 period, at a time when the Planet Townsite was being proposed for development on the adjacent private lands.

The State selected these sections in the common school indemnity lieu selection program, to be ready to capitalize on the Planet Townsite development. As you know, the Planet Townsite Plan has been abandoned and the City of Scottsdale has purchased the water rights for transfer to the Phoenix Metropolitan Area. There does not appear to be any good reason for the State to retain its ownership in Township 11 North, Range 16 West. We, therefore, want to make the following additional comment on the Resource Management Plan. 1

We want you to include the following State lands for acquisition in the Plan:

T11N, R16W

NE4SE4 of Sec. 2, Sections 4, 8, 10, 14, 22 and N2; N2S2 of Sec. 26.

Mr. J. Darwin Snell
April 17, 1985
Page Two

1 We plan to include these State lands in our package of scattered school sections we want to trade to BLM in your District.

This may change your intention to designate the BLM lands in D-9 for disposal.

Sincerely,

Robert K. Lane
State Land Commissioner

GEC:fg

Attached - Letter

cc: Mr. James E. May
Manager
Havasu Resource Area
Bureau of Land Management
3189 Sweetwater Avenue
Lake Havasu City, Arizona 86403

-2-

BLM recognizes the desert tortoise as a special status species yet fails in any of the six alternatives to provide direction for protection or enhancement of the tortoise and its habitat. The habitat of desert bighorn sheep, another special status
1 desert-dwelling species, was addressed in the RMP and much of its crucial habitat has been proposed for some degree of protection through designation of priority wildlife habitat areas. Why was the desert tortoise not given the same consideration?

Desert tortoise populations in the Colorado and Mohave Deserts are highly fragmented due to agriculture, road construction, off-road vehicle use, grazing, utility corridors and other human-related activities which alter or destroy their habitat. While these are valid uses of federal lands, they must be balanced with the habitat needs of the species. Adequate protection for remaining tortoise populations within the Yuma District cannot be accomplished when there is no attempt to evaluate available data or to collect information in areas where none exists.

We recommend that the Yuma District office contact the Desert Tortoise Council, California Department of Fish and Game, and Arizona Game and Fish Department to discuss the status of tortoise populations within their boundaries. Based on the existing information, BLM should designate priority wildlife habitat areas for special management consideration of the desert tortoise. The Council will be happy to assist BLM in determining locations of crucial desert tortoise habitats within the Yuma District. For areas where no data exist, BLM should conduct surveys of all Yuma District land with potential desert tortoise habitat to obtain this information. Within the next few years this information should be incorporated into a revised RMP and additional priority wildlife habitat areas should be designated for the desert tortoise.

Certain restrictions on multiple use activities should apply in all priority wildlife habitat areas including those for the desert tortoise and bighorn sheep.

1. Vehicle use should be restricted to designated roads and ways.
2. No ephemeral or seasonal grazing use should be permitted.
3. These areas should be withdrawn from mineral entry, and energy development and exploration should be restricted to a no surface occupancy classification.
4. Developed recreation or long-term visitor use should be prohibited.

2 Because BLM has presented little data on the status of the desert tortoise in the Yuma District, the potential impacts from implementation of any of the six alternatives discussed in the draft RMP-EIS cannot be adequately addressed. Consequent-

268

THE DESERT TORTOISE COUNCIL

5319 Cerritos
Long Beach, Calif.
90805

April 15, 1985

J. Darwin Snell
District Manager
Bureau of Land Management
Yuma District
P.O. Box 5680
Yuma, Arizona 85364-0697

Dear Mr. Snell:

The Desert Tortoise Council regards the Yuma District of the Bureau of Land Management as a valuable resource for fish and wildlife. We support the concept of a resource management plan as a tool to balance competing resource demands while protecting and sustaining wildlife values. Unfortunately, none of the alternatives presented in the Draft Resource Management Plan and Environmental Impact Statement fulfills that concept.

The development of a successful resource management plan requires that detailed information on the current status of the resources involved be acquired prior to the planning process. Without this knowledge, any management decision is based on speculation and cannot be considered valid. From the information provided in the draft RMP it appears that the Yuma District has spent a great deal of time and manpower in obtaining information on developed recreation use and need, livestock grazing, mining claims, agricultural development, and cultural resources. Very little information is provided on wildlife values. As a result the wildlife resources will continue to decline primarily from habitat degradation. Multiple use activities will continue on BLM lands without adequate compensation for wildlife resource impacts because little or no biological data exist. In other cases, non-permitted activities are responsible for wildlife resource declines because BLM does not have the ability (manpower) to enforce its own regulations.

-3-

2 ly, BLM is required under CEQ regulations to provide a worst case scenario of these impacts. We believe BLM has not complied with CEQ's requirements; therefore, the environmental consequences of each alternative as it may impact the desert tortoise need to be rewritten as a worst case scenario.

Our specific comments on the draft RMP with regard to the desert tortoise and its habitat include the following:

- Page 9, Rangeland Monitoring - Monitoring of livestock utilization should be done for ephemeral vegetation as well as perennial species. Because a majority of desert tortoise diet is ephemeral vegetation, it is critical to their survival that adequate quantities and varieties of annuals
3 are available for foraging as well as seed production for future years. Please provide detailed information on how ephemeral forage utilization will be restored.
- Page 12, Energy and Minerals Program - We are
4 interested in the list of stipulations that are routinely included in mineral developments and energy plans.
- Pages 14-15, Special Management Areas - Milpitas
5 Wash should be managed as an ACEC or similar resource protection designation. This action would be consistent with the BLM's Desert District which has recognized the outstanding wildlife values of this area.
- Page 20, Off-Road Vehicle Use - Under the Preferred Alternative, ORV use would be restricted to existing roads and trails except in two areas where ORV activity would be permitted. These are the Parker 400 course and Ehrenberg Sand Bowl. BLM fails to define what an existing road or trail is,
6 whether a wash is considered a road or trail, and how a new road created by unauthorized off-road vehicle riding will be categorized, and how this ORV designation will be implemented and enforced. The DTC supports an ORV use for the entire Yuma District which is limited to designated roads and trails. Therefore, we are opposed to the designation of two proposed competitive use ORV areas. Implementation of management and monitoring plans for past ORV races along the Parker 400 course have been lax or non-existent. No compensation is provided by the racing participants or the organizers who profit from this race for the destruction of wildlife and vegetation, increased soil erosion and air pollution which results from their activities. Some of this degradation occurs adjacent to an area recommended for wilderness designation.

-4-

7 -Page 134-138, Mitigation Measures - No mitigation measures for the desert tortoise are listed, with the exception of utility road closures to the public. We would be happy to meet with you to develop additional mitigation for the desert tortoise.

8 -Page 148, Action 9, Monitoring and Evaluation - According to the draft RMP the intervals and standards for the monitoring plan will not be developed until the final RMP or Record of Decision. This monitoring plan is part of the description of each alternative and should have been included in Chapter 2 for the six alternatives. By waiting to publish the monitoring plan in the final RMP or Record of Decision, the public will not have the same opportunity to review and comment on it as they have the rest of the proposed actions and impacts in the draft RMP.

-Pages 193-214, Appendix B, Affected Environment - Please include citations with any data that are presented on locations or densities of desert tortoises in wilderness study areas.

9 -Page 248, Appendix E - Please note that the desert tortoise is protected in California and is a Candidate 2 species according to the Fish and Wildlife Service.

In summary, the draft RMP and EIS fails to recognize the special wildlife values within the Yuma District, to balance multiple use and sustained yeild with protection of important desert biological habitats, and to adquately describe the impacts to the desert tortoise and its habitat from implementation of any of the six alternatives.

Thank you for the opportunity to comment on this document.

Sincerely,

Daniel C. Pearson

Daniel C. Pearson
Senior Co-chairman

DCP/ms

-1-

General Comments

Establishment of wilderness areas can benefit other resource and environmental values such as water quality and air quality. Designation of suitable land as "wilderness areas" tends to be environmentally preferable since it often affords a greater level of environmental protection. Accordingly, we have the following specific comments about the wilderness selection criteria in the DEIS.

1. The rationale for the Bureau of Land Management's "nonsuitable" declaration of Wilderness Study Areas (WSA) is unclear. The specific WSAs include Cactus Plain, East Cactus Plain, Kofa Unit 3, Kofa Unit 4 and the Muggins Mountains.

   a. The FEIS should contain detailed maps of active and potential mineral claims, either metallic, nonmetallic, oil and gas, or geothermal, that preclude suitable declarations in the WSAs. BLM should discuss the the number of active mining claims in each WSA.

   b. Areas where ORV use is substantial within a WSA should also be included on the maps and in the disclosure of nonsuitable areas.

   c. The description of Alternatives C and D present arguments for suitable areas that are potentially manageable under BLM's authority. The FEIS should identify the criteria used to select suitable wilderness area in the Preferred Alternative (54,230 acres) versus Alternative C (73,045 acres), the Balanced Production Alternative, and Alternative D (144,935 acres), the Balanced Protection Alternative (p. 23).

1 2. BLM should disclose the criteria used to consider SMAs separate from WSAs when the two areas are contiguous or subsections of a larger area. Map 7 shows that the following Special Management Areas (SMA) and WSAs either border or overlap each other:

   a. Crossman Peak (NA-1 and 5-7B),
   b. Whipple Mountain (NA-3 and 5-10),
   c. The Mesa (NA-4) and Gibraltar Mountains (NA-5 and 5-12),
   d. Banded Canyon (NA-6), Planet Peak (NA-7) and Swansea (5-15A),
   e. Cactus Plain (NA-8, NA-8A, NA-8B, 5-14A/B and 5-17),
   f. Big Marias (NA-10 and 5-19),
   g. Trigo Mountains (5-23A and 5-23B), and
   h. Muggins Mountains (NA-13, NA-13A and 5-53A).

   EPA recommends that BLM give every consideration to WSAs that border National Wildlife Refuges, National Wildlife Management Areas or other WSAs.

269

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
215 Fremont Street
San Francisco, Ca. 94105

APR 1 9 1985

J. Darwin Snell, District Manager
Bureau of Land Management
Yuma District Office
P.O. Box 5680
Yuma, Arizona 85364-0697

Dear Mr. Snell:

The Environmental Protection Agency (EPA) has reviewed the Draft Environmental Impact Statement (DEIS) titled YUMA DISTRICT RESOURCE MANAGEMENT PLAN; YUMA, LA PAZ AND MOHAVE COUNTIES, ARIZONA AND SAN BERNARDINO, RIVERSIDE AND IMPERIAL COUNTIES, CALIFORNIA. We have the enclosed comments regarding this DEIS.

We have classified this DEIS as Category EC-2, Environmental Concerns - Insufficient Information (see attached "Summary of Rating Definitions and Follow-Up Action"). This DEIS is rated EC-2 because: 1) clarification of Wilderness Study Areas (WSA) designation criteria is requested, 2) water resources and air quality issues need to be addressed, and 3) potential pesticide use within the resource area should be discussed. The classification and date of EPA's comments will be published in the Federal Register in accordance with our public disclosure responsibilities under Section 309 of the Clean Air Act.

We appreciate the opportunity to review this DEIS. Please send five copies of the Final Environmental Impact Statement (FEIS) to this office at the same time it is officially filed with our Washington, D.C. office. If you have any questions, please contact Patrick J. Cotter, Federal Activities Branch, at (415) 974-0948 or FTS 454-0948.

Sincerely yours,

for Charles W. Murray, Jr.
Assistant Regional Administrator
for Policy and Management

Enclosure (4 pages)

-2-

2 3. The FEIS should fully explain the management techniques that will be used in SMAs such as national scenic areas, scenic corridors, areas of critical environmental concern, outstanding natural areas and natural resource experiment and research areas listed in Table 2-1 (p. 15). This discussion should address maintenance of water quality and mitigation measures to prevent potentially significant environmental impacts.

3 4. BLM should ensure that Environmental Assessments (EA) will be prepared for the following activities within the resource area:

   a. Rights of way for utility corridors and communication sites,
   b. Energy and mineral resources development, and
   c. ORV use and associated activities in the Parker 400 desert race.

   These EAs should assess environmental impacts on a site specific basis. Assessment criteria should be identical to those incorporated in the FEIS including but not limited to water quality, air quality, wildlife, WSAs, range resources, vegetation and irreparable site degradation.

4 5. Table 2-1 is misleading. The total acreage listed at the bottom of the table is not equal to the "yes" designations under any of the six alternatives. This should be clarified in the FEIS.

5 6. The FEIS should state improvements which are necessary on the Ganado and Nine Mile ranges and give a plan for making these improvements (p. 57-58). It should also clarify when grazing is allowed on ranges designated perennial or ephemeral.

Water Quality Comments

6 1. The FEIS should provide baseline information and a detailed map of water resources within the resource area. The discussion should address management plans and mitigation measures to protect water quality of:

   a. Springs and wells,
   b. Ponds and reservoirs,
   c. Perennial streams and hydrographic basins, and
   d. Riparian communities.

7 2. The FEIS should disclose the percentage of riparian acreage that the 25,000 acres of riparian vegetation represents for the resource area (p. 13). Effective mitigation should be proposed to protect and enhance riparian zones, wilderness areas and water resources in the resource area. Management of grazing, ORV use and energy or mineral resource development should be considered in the mitigation plan.

-3-

Air Quality Comment

8 The FEIS should provide baseline information for existing air quality in the resource area because all references to existing air quality are qualitative (pp. 51 and 80). This information will serve as background data for subsequent EAs that will be produced for individual actions within the resource area.

Pesticide and Herbicide Comments

Chapter 4 of the DEIS titled "Environmental Consequences," lists several activities that potentially employ pesticides to some degree. EPA recommends that the FEIS discuss potential pesticide usage for recreation, range and wildlife management plans. The following areas should be addressed where appropriate.

1. If pesticide or herbicide use is proposed, the FEIS should show that the compound is:

   a. Registered with EPA,
   b. Registered for the specifically proposed use,
   c. Marked with a current label,
   d. Applied by a certified applicator or by personnel under the direct supervision of a certified applicator,
   e. Used in accordance with all state and federal laws, and
   f. Applied in such a way that precautions are taken to protect workers during the operation.

9 2. The FEIS should discuss the use of pesticides or herbicides in relation to the following topics:

   a. Cattle-dip treatment,
   b. Fire prevention programs,
   c. Predator control programs,
   d. Wood preservative treatment for fences,
   e. Vegetation control near roads and right-of-way corridors, and
   f. Control of disease vectors such as fleas.

3. The FEIS should address the following considerations for the safe use of pesticides or herbicides in the project area:

   a. Provisions for mixing, storing, loading and disposal of pesticides or herbicides,
   b. Spill prevention contingency plans (SPCP),
   c. Adverse effects on nontarget species,
   d. Applicator safety and prespraying notification procedures,
   e. Impacts on aquatic resources,
   f. Current status of the pesticide or herbicide to be used, and
   g. Alternative means of achieving desired management goals.

270

KOA®
5603 NORTH HWY 89
TELEPHONE (602) 526-8926
Flagstaff KOA
Franchisee of Kampgrounds of America, Inc.
FLAGSTAFF, ARIZONA 86001

April 15, 1985

Planning Coordinator
Yuma District Offices
3150 Winsor Ave.
Yuma, Ariz. 85365

Dear Sir:

It is my understanding that you are in the process of accepting comments concerning Long Term Visitor Areas along the Colorado River, therefore, I'd like to provide these comments for your consideration.

For a number of years, various agencies that are responsible for controls of vast areas of public land have been attempting to develop better methods of fee structures and reduction of facilities. This would enable them to reduce maintenence costs or place themselves in a better financial position to maintain existing facilities. In some cases, legislation has enabled agencies to increase fees to a more reasonable rate. Again this year, that action is repeating itself in Washington, D.C. and there have been reams of correspondence written concerning Government competition with the private sector.

The deserts of Arizona and California are attracting many winter visitors who take pride in finding a cheap or even free place to squat, and I'm sure that this gives the BLM many headaches as the numbers increase.

Your Bureau has recently established the $25 permit policy in an effort to help control the situation. The $25, in my opinion, is nothing less than insulting to both the user and to me as a private entrepreneur. I'm sure that charging $10 a day would not have been any more insulting to many of those campers than charging the $25 for the 6 month permit.

The small permit fee however, does encourage them to stay on BLM land at taxpayers expense as opposed to staying in a private campground at the going rate. By staying in a private park, they would be contributing to the economy rather than to be a liability to it.

I realize that the growth of these visitors has been greater than the development of private camps and I would be very cautious about investing in a private development anywhere in the area because of the inequity in the competition of this BLM program. Freeloaders are attracted to the area for obvious reasons. I would welcome the opportunity to host any number of these people in my establishment but it would need to be at the usual rate as I am obligated to meet minumum requirements and pay the usual taxes. I would hope to enjoy a small profit after paying the mortgage.

More consideration should be given to methods of controlling the BLM guests.

Close coordination with the private sector through concessions might be an answer.

Fencing may be another alternative.

Thank you for considering these comments.

Sincerely,

Jack Denton

Jack Denton
3938 W. Northview
Phoenix, Ariz. 85021

SUMMARY OF RATING DEFINITIONS AND FOLLOW-UP ACTION*

Environmental Impact of the Action

LO—Lack of Objections
The EPA review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

EC—Environmental Concerns
The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impact. EPA would like to work with the lead agency to reduce these impacts.

EO—Environmental Objections
The EPA review has identified significant environmental impacts that must be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

EU—Environmentally Unsatisfactory
The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the CEQ.

Adequacy of the Impact Statement

Category 1—Adequate
EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

Category 2—Insufficient Information
The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses, or discussion should be included in the final EIS.

Category 3—Inadequate
EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the NEPA and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

*From: EPA Manual 1640 Policy and Procedures for the Review of Federal Actions Impacting the Environment

271

RIVERSIDE COUNTY PLANNING DEPARTMENT

MH:2915
April 17, 1985

United States Department of the Interior
Bureau of Land Management
Yuma District Office
Post Office Box 5680
Yuma, Arizona 85364-0697
Attn: Planning Team Leader

Gentlemen:

This letter is in response to your request for our review and comments on the draft Resource Management Plan (RMP) and Environmental Impact Statement (EIS) for the Yuma District planning area. We have reviewed the Riverside County Comprehensive General Plan to identify existing and proposed development, resources of value to the County and environmental hazards which may conflict with the RMP. Our comments on the adequacy of the EIS are provided below. We hope you will address these concerns in the Final Environmental Impact Report (FEIR).

We have identified a number of resources within Riverside County which may be adversely impacted by the RMP. We feel that the FEIR should more adequately address these potential problem areas. Adverse impacts may occur to agricultural, recreational, and wildlife resources, and these are described in more detail below.

Proposed utility corridor UC-7 (Interstate 10) and utility corridor UC-8 (Palo Verde-Devers) go through prime farmland and statewide important farmland (County of Riverside Comprehensive General Plan (CGP), p 382).

1 The construction of pipelines, power and utility lines with accompanying towers, access roads, generators, or substations could result in loss of valuable agricultural land. Construction of this kind could create barriers that divide fields and interfere with the efficiency of agricultural activities. Road construction could result, in short-term impacts from dust production on sensitive crops in adjacent fields. These concerns need to be addressed in the FEIR.

2 A number of wildlife species in Riverside County may be adversely impacted by the proposed RMP (CGP, p. 388). The RMP may result in habitat destruction or other adverse impacts of human activity, particularly off-road vehicle use. The wildlife species which may be adversely affected are: the State Rare and Federally Endangered Yuma Clapper Rail (Rallus Longirostris Yumanensis); the State Endangered Elf Owl (Micrathene Whitneyi); the State Rare California Yellow-Billed Cuckoo (Coccyzus Americanus Occidentalis); and the Desert Bighorn Sheep (Ovis Canadensis Nelsoni). The potential adverse impacts of the RMP on these wildlife species should be addressed more fully in the FEIR.

4080 LEMON STREET, 9TH FLOOR
RIVERSIDE, CALIFORNIA 92501-3657
(714) 787-6181

46-209 OASIS STREET, ROOM 304
INDIO, CALIFORNIA 92201
(619) 342-8277

3 There are also potential adverse impacts to recreational resources along the Colorado River. Visual and noise impacts to County recreational areas could result from adjacent recreational activities such as off road vehicle operation in land covered by RMP. Visitor overflow from recreational areas in the Yuma District planning area could also impact Riverside County Parks. These potential adverse impacts need to be addressed in the FEIR. Parks in Riverside County which may be affected are Miller Park, Ehlers Backwater, Goose Flat and Mayflower Park (CGP, p. 212). In addition, there are two bicycle routes which may be affected, a Class I bike path (bikes only) adjacent to Highway 95 and a Class II bike lane (delineated lane within a road right of way) along the river. (CGP, p. 238). The Riverside County Parks Department should be consulted on these matters. A coordinated planning effort between you and the County Parks Department to provide recreational opportunities along the Colorado River may benefit all concerned and you may wish to pursue such a course.

We hope that these comments prove useful in your preparation of the FEIR.

Very truly yours,

RIVERSIDE COUNTY PLANNING DEPARTMENT
Roger S. Streeter, Planning Director

Jerry Jolliffe, Supervising Planner

JJ/MH/sjc

272

April 18, 1985

Yuma District BLM
P.O. Box 5680
Yuma, AZ 85364

Regarding: Wilderness recommendation

We would like to learn more about the BLM's recommendations for wilderness designations in Arizona. Twenty years ago we lived in Yuma and enjoyed many trips into the surrounding area. We experienced the solitude and unique habitats the close by mountains offer. During visits in the last years we saw the tremendous population increase in and around Yuma with visible signs of pressure to the natural and recreational resources. It is very important to protect the areas which still offer the feeling of wilderness for future generations.

Please let us know how we can participate in the fate of the spectacular wild country we have in Arizona. We would appreciate more information about the proposed wilderness areas and why areas like Swansea, Trigo Mountains, Muggins Mountains and the East Cactus Plain were not included into the wilderness proposal. We urge you to reconsider these areas.

Sincerely,

Vincent Barbara Roth

Vincent and Barbara Roth
Box 6
PORTAL AZ 85632

308

April 20, 1985

J. Darwin Snell, District Manager
Bureau of Land Management
P.O. Box 5680
Yuma, Arizona

Dear Mr. Snell,

I have reviewed the Yuma District RMP and EIS and would like to offer the following comments. I am sorry that these comments are late, but I learned of the RMP only recently.

A. Yuma Desert

This area is special for me. I have admired and visited this area often. It is a simple kind of desert with few plants or animals. But this is what makes it attractive. I enjoy walking this desert, especially in the spring when one can find flowers such as sand verbena, desert lily, and primrose.

I have never seen a flat-tailed horned lizard or a sand food plant (at least in the Yuma Desert), but I'd like to think that I will someday. But unless steps are taken to preserve this area -- as a special management area or an ACEC -- I may not get the chance.

B. Muggins Mountains

Yesterday I went hiking in the Muggins Mountains WSA. I started in Muggins Wash and hiked up to the base of Klothos Temple. If any area deserves wilderness status, this is it. The area is characterized by deeply cut washes lined with blooming palo verdes and acacias. Towering above the washes are the rocky peaks of the mountains themselves. Once beyond the mouth of Muggins Wash, I saw no evidence of people. Please recommend this area as wilderness.

C. Utility Corridor UC-8

This corridor cuts through the Kofa National Wildlife Refuge, disturbing wildlife and degrading visual quality in this agency-endorsed wilderness study area. Another corridor is available (along Interstate 10) which could be used instead of the Kofa route. I strongly recommend that the UC-8 corridor be closed and that future powerlines, pipelines, etc. be routed along Interstate 10.

Sincerely,

Richard Kendall, Member
Yuma Audubon Society

309

UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

APR 16 1985

Mr. Dennis Turowski
Planning Team Leader
Bureau of Land Management
Yuma District Office
Post Office Box 5680
Yuma, Arizona 85634

Dear Mr. Turowski:

In response to the request from J. Darwin Snell to the Nuclear Regulatory Commission we have reviewed the Yuma District Resource Management Plan and Draft Environmental Impact Statement (EIS). Our review was directed to whether the action described in the draft EIS involved matters within our jurisdiction by law or special expertise or had any potential impact on NRC licensed facilities.

Our comments are related to the Palo Verde-Devers 500 kV Transmission Line which crosses BLM Yuma District lands along utility corridor designated as UC-8 in Map 2 of the EIS. We have the responsibility for assessing the environmental impacts related to construction and operation of transmission lines as part of the licensing review process for the Palo Verde Nuclear Generating Station.

1 The preferred alternative for the resource management (pg. 13) plan and alternative E (pg. 35) indicate that utility rights-of-way access roads will be closed to public entry. No mention is made of limiting public entry to access roads under the other management alternatives although limiting Off Road Vehicle (ORV) use is discussed. Clarification is needed to more clearly define which alternatives would require closing of utility access roads.

2 The preferred alternative does not include a discussion of impacts associated with ORV use of utility access roads and rights-of-way. A discussion of expected impacts of ORV use of these roads should be included particularly as related to wildlife populations, vegetation and erosion potential.

Mr. Dennis Turowski -2- APR 16 1985

Please contact Mr. Edwin D. Pentecost (FTS 492-8099) if you have any questions concerning our comments. Thank you for the opportunity to review the draft document.

Sincerely,

James P. Knight, Acting Director
Division of Engineering
Office of Nuclear Reactor Regulation

311

UNITED STATES
DEPARTMENT OF THE INTERIOR
FISH AND WILDLIFE SERVICE

Ecological Services
2934 W. Fairmount Avenue
Phoenix, Arizona 85017

April 22, 1985

Memorandum

To: District Manager, Bureau of Land Management, Yuma District Office, Yuma, AZ

From: Field Supervisor

Subject: Draft Yuma District Resource Management Plan and Environmental Impact Statement

We have reviewed the Draft Yuma District Resource Management Plan and Environmental Impact Statement and offer the following comments for your consideration.

According to the Federal Land Policy and Management Act of 1976, BLM is required to manage the resources on public land for multiple use and sustained yield. This legislation also dictates that public land be managed in a manner that will protect the quality of the scientific, scenic, historical, ecological, environmental, air and atmospheric, water resources, and archeological values, and that will provide food and habitat for fish and wildlife.

After reviewing the six alternatives (including the preferred alternative) presented in the Draft RMP-EIS, it appears that they all fail to comply with FLPMA concerning management of wildlife resources. We believe that multiple use and sustained yield of wildlife resources would be provided by a combination of alternative D, balanced protection, and alternative E, resource protection, with modifications. Alternative D should be implemented for Land Ownership Adjustments, Recreation Management in Floodplains, Cultural Resources, Natural Areas and Features, Authorized Grazing Use on Perennial Allotments, and Wilderness; Alternative E should be implemented for Communication Sites, Grazing Use on Ephemeral Allotments, and Off-Road Vehicle Use. In addition, priority wildlife areas should be expanded from the riparian and bighorn sheep areas described in alternative D to encompass habitat of all state-listed species which occur within the Yuma District's boundaries including the flat-tailed horned lizard, fringe-toed lizard, desert tortoise, and razorback sucker. If these areas are to provide for sustained yield of these diminishing wildlife species and their habitats, we believe the following special management stipulations should be included:

1. Vehicle use should be restricted to designated roads and trails;

2. No grazing should be authorized;

2

3. No surface occupancy for mineral and energy exploration or development, utility corridors and communication sites, or recreation developments should be permitted unless complete compensation for wildlife resource impacts will be provided.

For all alternatives presented, there are two major omissions from the document: 1) references to inventories of resources and published literature, and 2) description of the monitoring program. Little wildlife information is provided concerning species locations within the Yuma District or population status. We consider this a major flaw in the development of this resource management plan. Much information on wildlife locations and status is available from the state game and fish agencies. Information that is lacking should be obtained as soon as possible and incorporated into the draft RMP-EIS. If these data are not adequate to determine wildlife resource status, then we believe BLM should comply with the Council on Environmental Quality's regulations which require that a worst case environmental analysis must be assumed and presented.

1

2 No monitoring program is described in the document. The purpose of a monitoring program is to detail how BLM will determine whether effective resolution of the planning issues and achievement of the desired results has occurred. A monitoring plan is part of the mitigation which is usually included in the description of each of the alternatives. The intervals and standards for monitoring should have been included in the DEIS for public review and comment. If it is not included until the final EIS or Record of Decision (page 148), this precludes the public from commenting on the adequacy of the monitoring plan. We suggest that an addendum to the DEIS which contains the monitoring plan be released for public review prior to release of the final EIS.

Specific Comments

3 Page 3, Special Management Areas - What restrictions on uses would be implemented and enforced with the designation of an area of critical environmental concern, research natural area, outstanding natural area, or scenic area?

Page 7, Recreation - The idea of a BLM Ranger Force to manage and enforce visitors recreation use is an excellent idea. It should be expanded to include enforcement other activities such as trespass use, wood collecting, and cultural resource protection.

3

4 Page 8, Threatened, Endangered, and Sensitive Species Habitat - Federal law provides for the conservation of federally-listed threatened and endangered wildlife species as well as those species proposed for listing.

5 Page 9, Grazing Administration, paragraph 1 - From the information presented it appears as though BLM cannot make any changes in a grazing permit for 10 years even if range conditions change. The permittee, however, has the option of requesting a change in grazing use. We believe BLM should have the same option. If range condition or trend decline during this 10-year period, BLM should require and enforce a downward adjustment in livestock allocation.

6 Rangeland Monitoring - How often will monitoring data be collected on each pasture of each allotment? We recommend that this be done at least three times during the year: first, before livestock are turned out to graze; second, approximately 1/3 to 1/2 through the pasture's use; and third, immediately after livestock have been removed from the pasture.

The DEIS says that adjustments in livestock numbers would only be authorized after 3 to 5 years of monitoring and all rangeland developments are constructed. This implies that neither increases nor decreases in livestock numbers can occur until these conditions are met. Although the Lower Gila Monitoring Plan may clarify these procedures, this document or relevant portions of it were not included in the DEIS. We suggest that the phrase "and all rangeland developments are constructed" be deleted.

The statement in the DEIS should be changed to read "In addition, increases in livestock numbers would only be authorized when monitoring..." Monitoring should include ephemeral forage on perennial-ephemeral allotments since ephemeral forage when present is generally more palatable than perennial shrubs. AMP's for all allotments partially or completely within the Yuma District should be developed and circulated for review to all interested agencies, organizations and individuals. Monitoring for PE allotments should study seasonal livestock use, forage utilization, trend and precipitation for both perennial and annual plants.

Page 11, Trespass Abatement - This is an excellent policy which should be strongly enforced. We recommend that the last sentence be modified to read " New cases of unauthorized use would be terminated immediately."

Recreation Program, General - The last sentence should be changed to read "These plans would include provisions for the avoidance of any resource degradation and correction of any visitor use management problems that occur at these sites."

4

Page 11, Floodplains Protection Program - Executive Order 11990 (wetlands protection) should be addressed. Consultation and coordination should be conducted by BLM with appropriate state, federal, and local agencies, individuals and organizations for all land actions which require preparation of an environmental document except for actions which are covered under categorical exclusions. BLM's apparent commitment to floodplain management is commendable and should be strictly enforced.

Page 12, Energy and Minerals Program - Before any exploration or development of leasable, locatable, or salable minerals on public land is permitted, we recommend that BLM require that a bond be posted as an incentive for the developer to use mining or exploration techniques that will result in the least amount of damage to the environment. In addition, BLM should inform all developers of salable minerals of necessary permits they may be required to obtain before issuing the BLM permit. This includes a Section 404 permit under the Clean Water Act from the Army Corps of Engineers. BLM should also insure that these mining operations comply with Executive Order 11990, wetland protection.

Pages 13-14, Issue 1: Wildlife Habitat - If the goal of the preferred alternative is to balance competing demands by providing for development of needed resources while protecting important and sensitive enviromental values, we believe this alternative as presented would not attain this goal. Approximately 25,000 acres of riparian habitat along the lower Colorado River would be managed as priority wildlife areas. This is an excellent management goal and should be implemented as soon as possible. However, the management of riparian areas for wildlife habitat appears to be only a designation on paper. No guidelines, restrictions, or stipulations are mentioned concerning other resource uses in this crucial and rapidly disappearing wildlife habitat such as recreation developments, long-term visitor use areas, off-road vehicle use, mineral and energy exploration or development, and livestock grazing. 7

These activities are generally not compatible with continued use of an area by most wildlife species. All of these activities except vehicular access should be prohibited in riparian areas. Vehicles should be restricted to designated roads and ways.

5

The management of seven bighorn sheep areas as priority wildlife habitat areas again is a positive step toward insuring the continued existence of this state-listed animal. Two restrictions, utility corridor width and road closures during lambing season, are included in the management of this wildlife habitat. Additional restrictions on activities should be placed on these bighorn sheep use areas including prohibition of livestock grazing especially sheep grazing, restriction of all vehicle use to designated roads and trails, no surface occupancy for energy exploration or development, and mineral withdrawal.

8 No priority wildlife habitat areas are designated for other state-listed endangered, threatened, or rare wildlife or plant species. Habitat for these species, including the fringe-toad lizard, desert tortoise and flat-tailed horned lizard, should be designated and managed as priority wildlife and plant habitat areas with similar restrictions as listed above.

9 Please define the phrase "existing roads and trails." Does this designation include only those roads present before 1986? We believe BLM will find it more difficult to enforce an OHV designation of existing roads and trails throughout the district rather than designated roads and trails. Once a person has driven across the desert, his tracks are visible for months, sometimes years, and he has created an existing trail. Continued violation of this existing roads and trails policy without adequate enforcement will eventually result in the fragmentation of wildlife habitat. Any wash should not be considered an existing road or trail unless it is bladed or regularly maintained. These xeroriparian areas in the desert provide crucial cover and food for numerous wildlife species.

10 We were unable to find any consideration or recommended management guidelines for aquatic habitat improvement or maintenance. A section on aquatic habitat management should be included.

Pages 14-15, Issue 2, Special Management Areas - Only two of 15 Unique Natural Areas and Features would be designated under the preferred alternative. Alternative A, no action, would designate six areas. We wonder why these six areas were not carried through from the Management Framework Plan. Many of these areas are recommended for designation by the State of Arizona under the Natural Areas Program. Aubrey Hills has already been designated under this program. 11 12

13 The reason given for not recommending formal designation of Cactus Plain is because it would already be managed to protect its natural values. If it will be managed with this goal, please explain why Cactus Plain should not be designated.

6

14 It is unclear what degree of protection would be provided if special management areas are designated. We could find no restrictions on recreation development, livestock grazing, mineral or energy exploration or development, vehicular access, utility construction, or other types of construction.

Again, the above mentioned activities are generally not compatible with maintaining the cultural or natural qualities of an area so special as to designate it a natural scenic area, area of critical environmental concern, outstanding natural area, or natural resources experiment and research area. Our recommended restrictions in priority wildlife habitat areas (pages 1 and 2 of our comments) should also apply to these special management areas.

Pages 14-16, Issue 3, Grazing Management - The grazing management objectives of improving ecological conditions in those areas with fair or poor condition and maintain the condition of those areas with good or excellent condition would benefit the wildlife resource. We hope that BLM will actively pursue and attain these objectives as soon as possible. Unfortunately, it appears that this will not be accomplished under the current authorized use and proposed management. Seasonal increases in grazing use should not be permitted to utilize big galleta grass. This perennial grass is a primary component in the stabilization of this dune community at La Posa and Cactus Plains. If the range is properly managed, we do not understand why supplemen-tal livestock feeding would be required. If there is inadequate palatable forage to sustain livestock, the stocking rate should be reduced or livestock removed. Big galleta grass did not evolve under the grazing pressure of large ungulates. Once this grass is removed, either by grazing or trampling, from a portion of the stabilized dune ecosystem, the soil will have lost its primary stabilizing component and will be carried by the wind to adjacent stabilized areas burying these plants. 15

16 The RMP implies that the management objectives for the Cactus Plain area are increased grazing through rangeland developments (the types of developments that will permitted should be specified) and wilderness until Congress makes its final determination. We assume that since this is a WSA, the rangeland development would be in accordance with BLM's management of this area as wilderness. We also assume that increased grazing will only be permitted when BLM can demonstrate that this action will not diminishthe wilderness values of this area.

17 The objectives of the Nine-Mile and Ganado allotments should be to maintain good and excellent rangeland conditions with stable or improving trend on at least 67% of the acreage. At 65% BLM is looking for a 2% decline in range condition: currently 67% is in good to excellent condition.

7

18 No information is provided on how the ten ephemeral allotments would be managed - how BLM determines proper stocking rate on ephemeral forage, monitors ephemeral utilization, and determines when livestock will be removed. This ephemeral forage is high in protein content, generally more palatable than perennial shrubs, and a necessary component in the diet of many wildlife species for successful reproduction and survival. We believe BLM should not permit seasonal or ephemeral forage utilization. Many desert adapted wildlife species barely survive dry years when ephemeral forage is scarce; they depend on the ephemeral forage available during wet years to get them through the dry years. By permitting additional AUM's when ephemeral forage is present, BLM is converting the traditional wet year to a dry year. Resulting adverse impacts to wildlife may include reduced fertility and recruitment which means reduced population viability.

19 Pages 16-18, Issue 4: Land Ownership Adjustments - The land acquisition proposals described in the text and on map 9 to benefit wildlife and unique natural values is commendable. However, these areas should be subject to the same stipulations previously recommended under Issues 1 and 2. We suggest that BLM acquire some lands along the lower Colorado and Gila Rivers. These riparian areas could be managed as priority wildlife areas with stipulations for habitat protection plus provide better management within the floodplains of these rivers. Agricultural lands that are not leased and are within the floodplains of the Colorado and Gila Rivers should be revegetated with native riparian species and managed as priority wildlife habitat areas with managements restrictions previously described.

20 Page 18, Issue 5: Rights-of-Way for Utility Corridors and Communication Sites - We do not understand why BLM is designating utility corridors but will still permit these facilities to be located outside these corridors. We believe all future facilities should be confined to these corridors. In addition, please note the following stipulations for future utility construction in the corridors that are depicted as traversing U.S. Fish and Wildlife Service refuges.

21 Utility corridor UC-3 (map 8) as it passes through Havasu National Wildlife Refuge will be restricted to 1/8 mile on either side of Interstate 40. This includes sections 2, 8 and 9 of T.15N., R.21W., G & SRM. Utility corridor UC-8 (map 8) should be deleted. Kofa National Wildlife Refuge will not permit future utility lines through the refuge except within 1/2 mile of Highway 95. Instead we recommend that BLM expand the width of utility corridor UC-7 along Interstate 10 to 1 1/2 or 2 miles and make this the east-west corridor through this portion of the Yuma District.

8

Pages 18-21, Issue 6: Recreation - The Yuma District's principal objective is meeting public recreation needs to the extent practical. Because recreation is such an important concern, we believe BLM should develop a recreation activity plan or plans which include detailed resource impact analyses, mitigation, and monitoring, and cover all BLM lands and their proposed management for the duration of the RMP. These plans should be circulated for public review and comment. To date, BLM has been granting long-term leases to private individuals, companies and public agencies on a case by case basis. This piecemeal approach to recreation management does not provide for long-term planning nor does it address the cumulative impacts of what has already been developed and will be developed in the future.

22 Limiting the length of stay on public lands is an excellent management idea but it needs to be enforced. How does BLM propose to inform the public of length of stay restrictions and how will these restrictions be enforced?

23 Under Management of Concessions and Leases we request that you remove the word "significant" from the last sentence in the first paragraph and replace it with "adverse". "Significant" implies that the only time BLM will deny recreation development or require full mitigation is when the project requires preparation of an environmental impact statement.

Long-term visitor areas should not be designated in the floodplain, special management areas or wildlife habitat management areas. If LTVA's are to be effective, it is important that BLM provide adequate enforcement, so that only designated LTVA's are used for longer than 14 days.

24 According to the text, two ORV areas would be designated under the preferred alternative. On map 2 there are three areas shown including Copper Basin Wash Sand Dunes and Crossroads which are not mentioned in the narrative. These two areas should be deleted from the map as should the dots west of Laguna Dam and in the northern part of the Wellton-Mohawk Valley.

Because of documented detrimental environmental impacts from organized off-road vehicle races, the Parker 400 course should be restricted to a single event per year with a season of use limited to one month. A management plan should be developed to protect the areas along the course, especially Osborne Wash and Cactus Plain. This plan should include specific monitoring and mitigation commitments for wildlife resources and should be developed and circulated for public review in time to incorporate the plan into the design of the 1986 race.

9

25 The proposed restrictions on wood collecting should be implemented and enforced. In addition, we recommend that non-collection areas be designated in this plan and should include special management areas and priority wildlife habitat management areas.

Please note that state permits are required to collect dead or detached firewood from mesquite, palo verde, ironwood, and crucifixion thorn trees. Also note that state permits are required for the collection of any plant protected by state law if the plant is removed from the landowner's property.

26 Page 40, Table 2-12, Wildlife Habitat - We concur that major adverse impacts to wildlife habitat would occur from grazing authorization increase of 94%. However, this statement should not be under Alternative B but under the Preferred Alternative since page xiii states that the Preferred Alternative will result in increased livestock use by 94% over current preference. Similarly, under Alternative D grazing use would not decrease by 40% but increase by 44% over current preference.

Since this 94% increase in grazing authorization under the preferred alternative will result in major adverse impacts to wildlife habitat, why is it preferred and what would be the mitigation for these major adverse impacts?

27 Also under the Preferred Alternative please explain how the 412, 520 acres of wildlife habitat was calculated. When adding 55,540 acres for wilderness, 31,360 acres for special management areas, 25,000 acres for riparian areas, and 216,960 acres and 7680 acres for bighorn sheep use areas the total is 336,540 acres.

28 Page 41, Table 2-12 Economics - Under the Proposed Action there is no subcategory under Economics to reflect that BLM will permit increased recreational development based on future demand. This should result in more jobs and more tax revenue.

29 Page 60, Recreation Opportunities and Use - Statistics on Long Term Visitor Use and ORV use are presented but none are given for backcountry recreation use or firewood collection. Some of this information should be available from Arizona Game and Fish Department and California Department of Fish and Game.

10

30 Page 63, Yuma Desert - Both Flat-tailed horned lizards and fringe-toed lizards occur in this habitat type.

31 Page 71, Wildlife - Big Game, Mule Deer - We suggest you contact California Department of Fish an1 Game concerning the stability of desert mule deer populations in California. In addition, the two state game and fish agencies should be able to supply population estimates (which should be included) for this as well as other species.

32 Page 73, Threatened and Endangered Species - This narrative should include an account of state-listed endangered, threatened and rare species in Arizona and California. Please note that the razorback sucker is not proposed for federal listing as a threatened species.

33 Raptors - The statement is made that predatory bird populations are stable. Please provide data to support this statement.

34 Page 79, General Assumption 1 - Since this is probably an unrealistic assumption given recent foreseeable budget cuts, we recommend that BLM prioritize all implementable components of the resource management plan so the public will know what will be implemented first, and if funding and manpower are available, what will be implemented later.

35 Page 79, General Assumption 4 - What is the life of the resource management plan? How frequently does BLM intend to review and update the information provided in the plan? We suggest that a revision of the entire plan occur once every five years. Prior to management adjustments being made, the public should have the opportunity to comment on these changes.

General Assumption 5 - Since no site impacts from actions are specifically projected in this plan, we have concluded that BLM will produce enivonmental documents for these actions as they are proposed and that these documents will include specific mitigation and monitoring plans and will be circulated for public review and comment.

Page 82, paragraph 1 - The adverse impacts to mineral and energy resources from a no surface occupancy stipulation would be minimal, not moderate, for the three reasons given.

36 Page 87-88, General Impacts on Wildlife - We request that BLM explain how the various alternatives will provide long-term benefits for wildlife by maintaining habitat conditions at current levels. Mineral, energy grazing and recreation development will still be permitted in some or

11

36 all of these areas and the lack of personnel to enforce ORV designation and recreation use should result in long-term adverse
37 impacts to priority wildlife habitat. In addition, there is no mention of adverse impacts that would occur to those species not found in the priority wildlife habitat and special management areas.

38 The Yuma clapper rail is a federally listed endangered species.

39 Page 94, Paragraph 1 and 14 - We concur that if the Preferred Alternative is implemented, both the Cactus and La Posa Plains will be adversely impacted from perennial-ephemeral grazing. Because the extent of these impacts is unknown, we believe BLM should include a worst case analysis of impacts in this EIS. Such an analysis should include acreage of each type of habitat lost or degraded and estimated numbers of special status species that would be lost. Because the proposed stocking rate will adversely impact these two special management areas one of which is a WSA, the stocking rates should be reduced or curtailed to protect the natural resource values of these areas.

Pages 97-98, Impacts on Wildlife - Please see above comment on worst case analysis.

40 Pages 134-138, Mitigation Measures - No specific mitigation measures are listed for wildlife except for restrictions on public utilities construction. We believe these measures are inadequate. We will be happy to work with you in developing additional mitigation measures for both general and specific types of activities that occur within the Yuma District.

Page 187, Map 2-13 - Please note that all of WSA 5-31 and part of WSA 5-33 are included in a withdrawal application for Kofa National Wildlife Refuge.

41 Page 247, Appendix E - The species and listing status of some of these species is incorrect. The spotted bat, Pacific tree frog, and Gila monster are not listed in Arizona. The river otter is listed as Group II in Arizona. The desert tortoise is a federal candidate species, the flat-tailed horned lizard is a Group III species in Arizona as are both the Mohave Desert fringe-toed lizard and Colorado Desert fringe-toed lizard.

42 Page 251, Appendix G - Please delete Havasu Heights North and South allotments and their proposed range improvements on page 258. Neither allotment is being used for livestock grazing.

12

Page 260, Appendix G-6 - All water tanks, stock ponds and similar structures that provide water for livestock should be designated so that wildlife, including birds and small mammals, have access to these waters.

43 Map 7 - Please note that the two east sections (sections 7 and 18) of the proposed Long Term Visitor Area 1 have been proposed as additions to the Kofa National Wildlife Refuge.

Thank you for the opportunity to comment on this draft RMP and EIS. If you have any questions please contact our office.

Gilbert D. Metz

cc: Fish and Wildlife Service/EC, Washington, D.C.
Regional Director, FWS, Albuquerque, NM (ABR)
State Director, Bureau of Land Management, Phoenix, AZ

316

DEPARTMENT OF THE ARMY
LOS ANGELES DISTRICT, CORPS OF ENGINEERS
P.O. BOX 2711
LOS ANGELES, CALIFORNIA 90053-2325

April 18, 1985

REPLY TO ATTENTION OF
Office of the Chief
Environmental Resources Branch

Mr. J. Darwin Snell
District Manager
Bureau of Land Management
Yuma, Arizona 85364-0687

Dear Mr. Snell:

We have reviewed the Yuma District Draft Resource Management Plan and Environmental Impact Statement as requested in a letter from your office dated February 12, 1985.

1 We suggest that the final EIS identify those aspects of the Resource Management Plan that would involve work or structures in the Colorado River, a "navigable water of the United States" or that would involve discharge of dredged or fill material into "waters of the United States". Corps of Engineers permits are required for structures or work in or affecting "navigable waters of the United States" pursuant to Section 10 of the River and Harbor Act and for the discharge of dredged or fill material into "waters of the United States" pursuant to Section 404 of the Clean Water Act. Any aspect of the Bureau's proposed Resource Management Plan that would result in structures or work in the Colorado River or that would result in the discharge of dredged or fill material into the Colorado River or any other waters of the United States would be subject to Army authorization pursuant to the above stated Acts whether performed by a federal or non-federal agency or by a private individual. The point of contact regarding the Corps regulatory program in the proposed project area is Mr. Glenn Lukos of our Regulatory Branch, at (213) 688-5606 or (FTS) 798-5606.

2 The Proposed Management Plan and EIS adequately address the flood-related issues in the flood plain of the Colorado River; however, we suggest that the final documents address flooding along the Gila River in more detail. Painted Rock Dam, a U. S. Army Corps of Engineers flood control facility, is located on the Gila River, approximately 125 miles upstream of its confluence with the Colorado River. The lower 50 to 60 miles of the flood plain of the Gila below the dam are included in the Proposed Management Plan. The dam was established with an agreement from local sponsors (Yuma and Maricopa Counties) to regulate the Gila River flood plain to accommodate 22,500 cfs releases without encroachment constraints. Unfortunately, encroachment has occurred since construction of the dam in 1959; therefore, we suggest that you coordinate any appreciable flood plain land use with the

-2-

2 Corps and do not rely entirely on the local governments for guidance. Road crossings, subject to flooding related to releases from Painted Rock Dam, have been a particular problem in the area; therefore, we suggest that potential transportation and access disruption due to sustained reservoir releases be addressed in the final EIS.

Thank you for the opportunity to review and comment on this document.

Sincerely,

Carl F. Enson
Chief, Planning Division

317

Southern California Edison Company

SCE

P.O. BOX 416
100 LONG BEACH BOULEVARD
LONG BEACH, CALIFORNIA 90801

REAL PROPERTIES DEPARTMENT

TELEPHONE
(213) 491-2627

Mr. J. Darwin Snell
District Manager
Bureau of Land Management
Yuma District Office
P. O. Box 5680
Yuma, AZ 85364-0697

April 24, 1985

Attention: Planning Team Leader

SUBJECT: Yuma District
Resource Management Plan (RMP) and
Environmental Impact Statement (EIS) - Draft
1601 (YDO)

Based on our review of the subject RMP report and our current information, we have the following comments and recommendations for your consideration.

We are pleased to see the recognition by the planning team of future corridor needs as an issue in the RMP. Corridor designation is a critical element of land use planning and is necessary to insure that routes are available for the orderly and efficient development of communication, energy and transportation systems to serve the public. We concur with the corridor
1 element of your plan; however, we recommend that it be revised to designate that corridors be a minimum of three miles in width.

Designation of the corridors shown in the Plan will provide the organizations responsible for developing communication, energy, and transportation systems for the public, a means of providing these services in an economical and dependable manner. In addition, a minimum corridor width of three miles will enable flexibility in siting facilities to avoid environmentally sensitive areas.

As a point of information, Edison is currently involved in studies, preparatory to the filing of an application, regarding the construction of a second transmission line from Palo Verde to Devers. One of the alternatives being considered is the

Mr. J. Darwin Snell -2-

paralleling, adjacent to or near, the existing Palo Verde-Devers 500kV T/L. This line would be within your designated corridor, shown as UC-8 on Map 8 of the subject RMP/EIS.

It appears that most concerns regarding use and protection of the resources within the District would be satisfied under the Preferred Alternative. Based on this, we support your Preferred Alternative.

Thank you for inviting our comments. We hope you will give them your full consideration. If further details are needed, please contact Mr. J. R. Wilson at (213) 491-2617.

Very truly yours,

DALE L. WOODWARD
LAND PROJECTS SUPERVISOR

JRWilson/dd/552s

320

NORTH PHOENIX CAMPGROUND

Black Canyon (I-17) & Deer Valley Road
2550 West Louise Drive
Phoenix, AZ 85027 • (602) 869-8189

Good Sampark

April 22, 1985

Planning Co-ordinator
Yuma District Office, B.L.M.
3140 Winsol Avenue
Yuma, Arizona 85365

Dear Sir:

As President of the Arizona R.V. & Campers Park Association I am writing this letter at the direction of our members. We represent private campground and R.V. park owners in the State of Arizona and are affiliated with the National Campground Owners Association whose offices are located in Washington, D.C.

We understand you would like our comments regarding the use of the land along the Colorado River known as Long Term Visitor Areas. As an organization we are going on record as opposing the existing $25.00 fee for camping in the area for a period of up to 8 months and we do not wish to see the B.L.M. develop any more plans to use the desert for this purpose.

Mr. Alan Belt on the Yuma office was in attendance at the April meeting of the Arizona R.V. and Campers Park Association. He explained why the B.L.M. needs to control the land usage in these areas. We are in sympathy to a certain degree but we feel that simply "NO CAMPING" would be the answer to your headaches. These people can well afford a private park and here again we feel the government is in competition with the private sector.

These people are destroying our deserts and we are giving them permission to do so with the $25.00 fee; plus all the publicity this program receives certainly encourages more people to come to this area thereby increasing the problem as years go by.

NORTH PHOENIX CAMPGROUND

Black Canyon (I-17) & Deer Valley Road
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Good Sampark

Planning Coordinator
Yuma District Office, B.L.M.
Page 2

We prefer to regard these Long Term Visitors as nothing but squatters who are reluctant about paying a fee of $25.00 which certainly does not even begin to cover the expense of their stay on the desert. This expense must be born by all taxpayers and the whole program does hurt the private park owners because these people would find a park they could afford if it were not so easy to freeload off our tax paying public.

Please consider these comments now and in the future.

Sincerely,

Barbara A. Duncan
President
Arizona R.V. & Campers
Park Association

BD:pao

326

Governor

Commissioners:
FRANCES W. WERNER, Tucson, Chairman
CURTIS A. JENNINGS, Scottsdale
W. LINN MONTGOMERY, Flagstaff
FRED S. BAKER, Elgin
LARRY D. ADAMS, Bullhead City

Director
BUD BRISTOW

Assistant Director, Services
ROGER J. GRUENEWALD

Assistant Director, Operations
DUANE L. SHROUFE

ARIZONA GAME & FISH DEPARTMENT

2222 West Greenway Road Phoenix, Arizona 85023 942-3000

RECEIVED ... MAY 1 ... AM '85 ... ARIZONA

May 1, 1985

Mr. J. Darwin Snell
District Manager
Bureau of Land Management
Yuma District Office
P. O. Box 5680
Yuma, Arizona 85364-0697

RE: Draft Yuma District Resource Management Plan and Environmental Impact Statement

Dear Mr. Snell:

The Arizona Game and Fish Department has reviewed the referenced draft RMP/EIS, and we offer for your consideration the following comments.

The Department found the draft RMP/EIS to be a well-organized, comprehensive document and, for the most part, accurately and adequately discusses the existing environmental conditions within the Yuma District and the expected environmental consequences of the six (6) alternative future management options for resolving the seven (7) major public interest resource management issues. Further, we believe the Preferred Alternative provides the most realistic avenue for future management of the majority of the resource management issues, but not all. Therefore, our specific comment will be presented by identified resource management issue and what we believe to be the management level indicated for that issue, given the data to support the decision and the circumstances surrounding the issue.

Issue 1: Wildlife Habitat

The Department definitely supports the concept of priority wildlife habitat areas. However, we recognize that in some of these priority wildlife habitat areas, such as riparian habitats, there is a great potential for conflict with other resource management issues, such as recreation. The determination of compatibility between the various resource management issues, and at what levels of use, will take considerable thought and careful

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Mr. J. Darwin Snell
May 1, 1985
Page 2

deliberation on the part of BLM. Overall, we believe that the Preferred Alternative would designate reasonable acreage of priority wildlife habitats.

A use we believe to be in significant conflict with maintaining optimum conditions in the priority wildlife habitat
1 areas, but which is not identified in the RMP/EIS, is ORV use. We question the restriction of ORVs to existing roads and trails, principally because there is no definitive determination or consensus of what is a trail or even a road. We genuinely recommend that ORV use be restricted to designated trails and roads in the priority wildlife areas.

One further concern involves surface occupancy for oil and gas leases within priority wildlife habitat. We do not believe that surface occupancy is justified in these priority wildlife habitats, particularly with the knowledge that the overall oil and gas potential for the District is estimated by the U. S. Geological Survey to be zero to low. (pages 56-57).

Issue 2: Special Management Areas

According to the Preferred Alternative (Table 2-1), two areas would be designated special management areas -- Crossman Peak and the Big Marias -- and five others would not be formally designated, but would be managed under special prescriptions to protect their natural values -- Aubrey Hills, Whipple Mountains, Gibralter Mountain, Cactus Plain, and Muggins Mountains. It is
2 not clear what the difference would be between formal designation as a special management area or not formally designated, but managed under special prescriptions to protect natural values. It would seem that the additional five areas could and should be formally designated, thereby eliminating any confusion as to the natural values they possess and the need to protect those values.

Further, we do not understand, nor are there data to
3 support, why the Mesa (NA-4) was not designated as a special management area, or was not included with the five other areas for management under special prescriptions, particularly since the No Action Alternative (existing status) has it so designated.

Lastly, we believe that ORVs should also be restricted to designated trails and roads in special management areas, to better insure the protection of cultural and natural values.

Issue 3: Grazing Management

Our Department views grazing as the most controversial resource management issue in the Yuma District, and as an issue that significantly influences natural resource values in the District. Overall, we are not convinced that livestock grazing, and in particular ephemeral allotments, is really justified on public lands in the District, since forage production on public lands in the District amounts to less than 1% of the total AUMs

Mr. J. Darwin Snell
May 1, 1985
Page 3

produced in Yuma, La Paz, and Mohave Counties (page 76). However, if livestock grazing is to continue in the District (i.e. on perennial-ephemeral allotments), we believe the overall objectives should be to have all grazed rangeland in good to excellent condition, not just 65% of the rangeland, otherwise the so-classed fair to poor rangeland should not be grazed at all.

Additionally, under the Management Guidance Common to All Alternatives we question the grazing administration (page 49) where 10-year grazing permits are issued. These permits should only be authorized when and where an operator has demonstrated
4 good range management and the overall allotment category is "M". It does not seem appropriate to issue a 10-year permit for allotments in the "I" category, since more frequent monitoring will normally be necessary to determine the progress of range improvement, and it may be necessary to alter the grazing program or level of use.

If the ephemeral allotments are continued, two of the 10 are
5 recommended to be eliminated -- Havasu Heights North and Havasu Heights South -- since they have been in non-use for some time.

Further, the Department does not condone supplemental feeding (page 16) to facilitate achieving overall management objectives in a grazed area. We believe the need for supplemental feeding indicates that the grazing management is not working and the authorized livestock numbers apparently are too high for the forage that was available or that was produced.

In evaluating the six alternative future management options with respect to grazing management, the Department prefers Alternative E, but Alternative D is acceptable with the 40 percent reduction in grazing which we believe should be the future long-term grazing level for the District.

Issue 4: Land Ownership Adjustments

The Department continues to support the concept of consolidation, exchange or acquisition, to produce a land ownership pattern that provides for more efficient and effective land management, with particular emphasis on priority wildlife habitats and special management areas/wilderness. We prefer the adjustments recommended in Alternative D, but have no strong objections to the Preferred Alternative recommendations.

Issue 5: Rights-of-Way

The Department concurs with the recommendation for utility corridors as proposed by the Preferred Alternative, especially with respect to the 330-foot limitation on the width of the Parker-Liberty corridor along the two-mile segment passing through the bighorn sheep lambing grounds in the Buckskin Mountains.

Mr. J. Darwin Snell
May 1, 1985
Page 4

An area of concern, however, involves the management of priority wildlife habitat, i.e. migration routes, where a utility corridor crosses the route. We believe that eventually, through the cumulative impacts of various future rights-of-way, the
6 utility uses may preclude the big game movement (bighorn sheep) that was of priority consideration for management/protection. We believe that monitoring of impacts along these crucial movement routes to determine cumulative effects of utility uses is definitely in order.

Issue 6: Recreation

The Department concurs with the proposed recreation management guidelines, as contained in the Preferred Alternative, with one exception -- ORV use. We emphatically recommend that all ORV use in priority wildlife management areas and in special management areas be restricted to designated trails and roads to better insure the protection of fragile soils, vegetation, and aesthetic natural values. Further, we support the season of use for the Parker 400 course as December 1 to February 28, but discourage the consideration of more than one race per year.

Regarding the wood collection sub-issue, the restrictions proposed in the Preferred Alternative are acceptable.

Issue 7: Wilderness

Again, the Department concurs with the proposal for wilderness recommendations as presented in the Preferred Alternative. We do believe, however, that all WSAs that made it to this point in the final analysis/study for wilderness designation consideration, which have documented natural resource/scenic value, are deserving of some level of future long-term management that can insure these particular values, even though they are not ultimately designated as wilderness. We suggest that they be given special consideration or management.

<u>Additional Specific Comments</u>

Page 58, Rangeland Condition and Trend

7 We question the validity of rating the vegetative condition on a single year's observation or even attempting to rate trend without any data to compare with.

Page 59-60, Recreation

No data are presented for the amount of use, either recreation days or hours, for fishing, boating, or hunting, but
8 the amount of ORV use and facilities use is presented. Fishing and possibly boating use information should be available for the lower Colorado river, since the Bureau of Reclamation contracted for this information. The information is probably not current, but could be updated.

Mr. J. Darwin Snell
May 1, 1985
Page 5

Page 72, Paragraph 1

9 The Department's view of livestock-mule deer competition for forage is that the competition can be significant during the annual flush of vegetative growth, when additional livestock are usually permitted on public lands. The "green-up" provides important seasonal forage resources for a diversity of wildlife species. It is a recovery period for desert wildlife, from periods of no or little precipitation and reduced food resources, and a period of prosperity for regenerating both annual and perennial plant species.

Page 72, Bighorn Sheep

10 We question whether bighorn in the Bill Williams Mountains make "extensive" use of the Bill Williams River, although they definitely use the river.

Page 72, Mountain Lions

11 The mountain lion in the Yuma District is Felis concolor browni, which is a candidate Category 2 species (federal).

Page 72, Small Game and Furbearers

12 White-winged doves and mourning doves are defined as migratory game birds, not upland game birds.

Page 73, Important Habitat Features, Riparian Vegetation

13 The Bill Williams River should be included in this list of rivers having riparian vegetation on BLM administered lands, as mentioned in Chapter 2, Page 13.

Page 77, Recreation

14 Again, no dollar values are credited to fishing, hunting, trapping, or boating recreational pursuits, based on user days.

Page 87 and 88, General Impacts on Wildlife

15 The status of the Yuma Clapper Rail is "endangered", not threatened and endangered.

Page 91, Impacts on Mineral and Energy Resources

With the overall oil and gas potential for the District estimated by USGS to be zero to low, we do not feel that the exclusion of surface occupancy on all priority wildlife habitats would be a significant impact to the publics interested in these resources.

Mr. J. Darwin Snell
May 1, 1985
Page 6

Page 92, Impacts on Rangeland Resources

Implementing AMPs on the two "I" allotments and the shift from continuous grazing to grazing systems, which would require greater concentration of grazing, does not automatically equate to increased AUMs. We question whether the additional 3,756 AUMs would actually result, or is needed. further, how does this goal correlate with recommendations for long-term grazing management, as specified in the Buckskin Mountains - Cactus Plain HMP, wherein the need to prohibit any actions that may increase or encourage livestock grazing in presently unused areas is stated?

16

A major consideration in any desert grazing area is the unpredictability of rainfall and the resultant effects of drought on perennial vegetation.

17 How does the designation of the Cactus Plain as wilderness affect the total grazing capacity (AUMs) of the two "I" allotments (Ganado and Nine-Mile)? Where are the data to predict increased grazing capacity for these allotments?

Page 93, Impacts on Recreational Resources

18 A major consideration for impact that was not addressed or aluded to, but which the Department believes should be addressed, is the influence/indirect impact of additional recreational opportunities and expansion of recreation facilities along the lower Colorado River on boating safety. The Parker Strip is already classified as a "saturated" boating use area, particularly on high demand weekends, and, historically, ranks as one of the highest boating accident incidence areas in Arizona. To encourage boating use in this segment of the river or any other segment of the lower Colorado, consideration needs to be given to public safety aspects, particularly where recreational boating use is concentrated by expansion of concessions or facilities on adjacent public lands.

Page 94, Impacts on Natural Areas and Features

Adverse impacts on natural area values on the Cactus Plain and La Posa Plain areas could be significantly reduced by reducing grazing use of these areas.

Pages 94 and 95, Impacts on Vegetation

19 Since it is widely recognized that grazing the La Posa Plain would negatively affect the unique vegetative community, why is grazing being continued, or even planned for expansion into unused areas? If insufficient data are available to adequately predict the severity of the impact, that, alone, would seem sufficient to eliminate or greatly reduce grazing until the data are collected and analyzed to determine the proper long-term management strategy for this unique vegetative community.

Mr. J. Darwin Snell
May 1, 1985
Page 7

Page 97, Impacts on Wilderness

As mentioned previously, any area that was in the final study process to determine wilderness suitability apparently has certain natural values, or it would not have gotten this far in the process, therefore, every WSA that is eventually dropped from wilderness designation by Congress deserves special management to preserve those existing natural values, and we believe that ORV use should be limited to designated trails and roads, at the very least, in those areas.

Further, we believe that those released areas should be closed to surface occupancy for oil and gas leasing, since the potential for these resources is zero to low.

Page 98, Impacts on Wildlife

20 Under the grazing discussion, mention is made of range projects on the Nine-Mile allotment; however, under the Preferred Alternative, Table 2-3 does not list any developments on the Nine-Mile, only on the Ganado allotment. How do the improvements proposed on the Ganado allotment affect wildlife?

Appendix E, pages 247 and 248

There are a number of corrections as to category or group for Arizona-listed threatened native wildlife. The current status is from "Threatened Native Wildlife In Arizona", Arizona Game and Fish Commission, 10 December 1982.

21
Spotted Bat - No longer on State List.
River Otter - Group II, not Group III.
Zone-tailed Hawk - No longer on State List.
Peregrine Falcon - Group III, not Group II.
Great Egret - Group IV, not Group III.
Black-crowned Night Heron - Group IV, not Group III.
Tropical Kingbird - Group III, not Group IV.
Gila Monster - No longer on State List.
Flat-tailed Horned Lizard - Group III, not Group IV.
Fringe-toed Lizard (both U. n. notata and U. n. scoparia) - Group III, not Group IV
Colorado River Squawfish - Group I, not Group II.

Mr. J. Darwin Snell
May 1, 1985
Page 8

The Department appreciates the opportunity to review the draft RMP/EIS, and we hope that our comments are useful in developing the final document.

Sincerely,

Bud Bristow
Bud Bristow
Director

BB:RKW:lea

343

ARIZONA WILDLIFE FEDERATION
4330 N. 62nd St #102 ▪ Scottsdale, AZ 85251 ▪ (602) 946-6160

ACE PETERSON
President

May 6, 1985

Planning Team Leader
United States Department of Interior
Bureau of Land Management
Yuma District Office
P.O. Box 5680
Yuma, AZ 85364-0697

Dear Sir:

The Arizona Wildlife Federation appreciates the opportunity to provide comments to the D.E.I.S. Yuma District Planning Area. The comentssupplied are basically those of James Breck, Yuma County Direcotr in conjunction with the Yuma Valley Rod and Gun Club among other participants. We are also appreciative of the decision to recieve these even though they are late in forthcoming.

1 When this Plan was taken under advisement in the Yuma area, several key concerns arose along with accompaning questions. These concerns in no order of importance are grazing, land disposal, recreation values and riparian areas. A few of the questions pertain to the following: What percentage of forage is available to wildlife? What are range forage capabilities now and projected under all alternatives? What types of range and/or grazing programs would be used to enhance range conditions? These questions were not addressed completely or definative enough in the D.E.I.S.. Questions needing answered also are those dealing with land disposal. It was not felt that these areas were described well enough to address wildlife and riparian values. Concern was voiced over disposing of areas D-1, D-3, and D-9 due to riparian values which need protection or enhancement.

2

Based upon the data available, and the concerns of those in the Yuma area, the Arizona Wildlife Federation selects alternative E, resource protection, as the alternative which most closely supplies the necessary mechanisms to alleviate our concerns. However, we would wish to modify this alternative as follows: Under grazing, use that data as outlined in alternative D, Balanced Protection with the provision that AUM's be balanced with or slightly less than forage projections to enable these resources to return as closely as possible to natural conditions. We would ask that grazing systems be closely adapted to the specific land areas in use. We urge that those range improvements necess-

ABBREVIATIONS

The following abbreviations are used in this Environmental Impact Statement. Most of the abbreviations for terms are defined in the glossary.

ACEC:	Area of Critical Environmental Concern	MFP:	Management Framework Plan
AMP:	Allotment Management Plan	MSA:	Management Situation Analysis
AUM:	Animal-Unit Month	NEPA:	National Environmental Policy Act
BLM:	Bureau of Land Management	NFIP:	National Flood Insurance Program
BR:	Bureau of Reclamation	NWPS:	National Wilderness Preservation System
C:	Custodial Category (grazing)	ONA:	Outstanding Natural Area
CAP:	Central Arizona Project	ORV:	Off-Road Vehicle
CDCA:	California Desert Conservation Area	P:	Primitive (ROS Class)
CEQ:	Council on Environmental Quality	P-E:	Perennial-Ephemeral (grazing allotments)
CFR:	Code of Federal Regulations	PILT:	Payments in-lieu of taxes
cfs:	cubic feet per second	R&PP:	Recreation and Public Purposes (land leasing)
COE:	U.S. Army Corps of Engineers		
CORRP:	California Outdoor Recreation Resources Plan	RMP:	Resource Management Plan
		RNA:	Research Natural Area
EA:	Environmental Assessment	ROS:	Recreation Opportunities Spectrum
EIS:	Environmental Impact Statement	ROW:	Rights-of-Way
EPA:	Environmental Protection Agency	SCORP:	Statewide Comprehensive Outdoor Recreation Plan
FEMA:	Federal Emergency Management Agency		
FLPMA:	Federal Land Policy and Management Act	SCS:	Soil Conservation Service
FWS:	U.S. Fish and Wildlife Service (also USFWS)	SMA:	Special Management Areas
		SPNM:	Semi-Primitive Non-Motorized (ROS Class)
GEM:	Geology-Energy-Mineral Reports	SRMA:	Special Recreation Management Area
HMP:	Habitat Management Plan	T&E:	Threatened and Endangered
HRA:	Havasu Resource Area	USDA:	U.S. Department of Agriculture
I:	Improve Category (grazing)	USDI:	U.S. Department of Interior
IMP:	Interim Management Policy (for areas studied for wilderness recommendations)	USFS:	U.S. Forest Service
		USFWS:	U.S. Fish and Wildlife Service (also FWS)
KGS:	Known Geologic Structures	USGS:	U.S. Geological Survey
LTVA:	Long-term Visitor Area	WSA:	Wilderness Study Area
M:	Maintain Category (grazing)	YRA:	Yuma Resource Area

ary in the allotments for wildlife and cattle be enhanced or maintained. We also urge the continued maintenance or enhancement of developed waters in protected or wilderness areas.

Sincerely,

Ace P. Peterson
President
Arizona Wildlife Federation

AHP/sv

cc: Dean Bibles, B.L.M. State Director
Curtis Jennings, Chairman, Arizona Game & Fish Commission
Bud Bristow, Director, Arizona Game & Fish Department
Jim Breck, AWF Yuma County Director
Joe Wilson, AWF LaPaz County Director

346

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May 6, 1985

Yuma District BLM
P.O. Box 5680
Yuma, Az 85364

Re: Wilderness Study Areas

Dear BLM;

We have learned of some of your recommendations through other sources. Time and again we have requested to be placed on your mailing list and needless to say we haven't recieved any mailings. Now, I've learned that as usual BLM seems to be dropping more and more areas from Wilderness Status as well as caving in to the Loud Mouth Minority called Off-Road Vehicular people.

I'm urging you to to include the Swansea area for Wilderness, as well as Crossman Peak, the Kofa areas, Trigo Mtn areas, as well as the Cactus Plains. We have gone around once before in regards to the areas of Tribal importance as well as the archaeological areas. Both are covered by other Federal Acts that I feel you haven't given enough consideration to.

Arizona is growing at an astounding rate and we are being flooded with Californians who have finished off so much of their State. In the Winter time we are getting not only the Easterners but lots of Canadians and so there is great pressure on the entire State. The deserts of Arizona do have limits and now is the crucial time. It would be best to preserve and protect as much as possible than to later wish that we had done better. I keep seeing mention of "mineral potential", yet we keep seeing the Copper Mines closing with statements that they have no idea when they'll be re-opening the existing mines. This makes it very difficult to follow the reasoning behind the excuses about potential mineral exploration. The minig companies have more than explored this State and they know where the ore bodies exist, so that reasoning is just too hard to justify at this time.

Sincerely yours,

William Beaver

Copies to Washington D.C.

352

Resources Building
1416 Ninth Street
95814

(916) 445-5656

Department of Conservation
Department of Fish and Game
Department of Forestry
Department of Boating and Waterways
Department of Parks and Recreation
Department of Water Resources
California Conservation Corps

GEORGE DEUKMEJIAN
GOVERNOR OF
CALIFORNIA

THE RESOURCES AGENCY OF CALIFORNIA
SACRAMENTO, CALIFORNIA

Air Resources Board
California Coastal Commission
California Waste Management Board
Colorado River Board
Energy Resources Conservation and Development Commission
San Francisco Bay Conservation and Development Commission
State Coastal Conservancy
State Lands Commission
State Reclamation Board
State Water Resources Control Board
Regional Water Quality Control Boards

Mr. J. Darwin Snell
Bureau of Land Management
Post Office Box 5680
Yuma, AZ 85364-0697

May 8, 1985

Dear Mr. Snell:

Attached are comments received from the Department of Fish and Game (DFG) regarding the draft Resource Management Plan and EIS, Yuma District.

Although DFG's comments are obviously submitted too late for inclusion in the final EIS, I hope that they may be of use to you in development of BLM's planning for the Yuma District.

Please accept our apologies for any undue hardship that our failure to meet the deadline may have caused your office. We appreciate having been given an opportunity to review your proposed plan.

Sincerely,

Charles K. Gallbour
for Gordon F. Snow, Ph.D
Assistant Secretary for Resources

Attachment

cc: Office of Planning and Research
1400 Tenth Street
Sacramento, CA 95814

(SCH 85012032)

State of California — The Resources Agency

Memorandum

To : Honorable Gordon K. Van Vleck
Secretary for Resources
1416 Ninth Street
Sacramento, California 95814

Attn: Gordon F. Snow, Ph.D.
Projects Coordinator

Date : April 26, 1985

From : Department of Fish and Game

Subject : Yuma District Resource Management Plan and EIS - SCH 85012032

Department of Fish and Game has reviewed the draft "Yuma District Resource Management Plan and EIS" and submits its comments for the California portion of that Plan. Our comments deal first with the more general aspects of the plan and then specific comments are listed for each issue.

Public opinion strongly favoring protection of desert scenery, wildlife, and environmental values was largely responsible for the Federal Land Policy and Management Act (FLPMA). Large majorities of respondents to a National Gallup Poll (1978) and a desert-wide (SRI International 1978) opinion poll identified more protection of wildlife and ecology and more protection of scenic qualities and natural character as their highest priorities for desert land use. In 1977 public opinion surveys conducted for the Bureau of Land Management (BLM) in California by Field Corp. showed that 79% of adult Californians viewed more protection of wildlife and ecological values to be the greatest need in the desert. This overwhelming public support for wildlife and BLM's recognition of sensitive species requires that there be redoubled efforts towards protection of the habitats necessary to support these species.

Yet this draft Resource Management Plan has recreation as its primary emphasis and the Plan appears to give recognition to wildlife only when it doesn't interfere with recreation. We believe there should be increased emphasis on protection of habitats with value for wildlife resources. In addition, more effort needs to be placed on developing knowledge on the status of "special interest" wildlife residing in the Yuma District, especially the desert tortoise and desert burro mule deer.

In addressing wildlife concerns, the wildlife portions of the document focus primarily on bighorn sheep as a priority wildlife species. However, by virtue of its highly significant economic and recreational values, the desert burro mule deer should also be qualified as a priority wildlife species. In addition, this deer is highly representative of most other desert wildlife species in its selection of habitats.

-2-

A recently concluded radio telemetry study of seasonal movements and habitat preferences of this desert deer found that deer mainly occupy the desert uplands during the cool season (September - May). Preferred habitat is then comprised of a network of dry wash woodlands in foothills and upper alluvial plains or terraces, and associated heads of major drainages. During the hot season (June - August) they occupy the lowlands near major water courses and habitat preference changes to riparian woodlands and in the absence of riparian woodlands, adjacent dry wash woodlands. The major wash systems connecting the seasonal home ranges are used as migration corridors. The corridors extend approximately six to ten miles in the Big Maria and Riverside Mountains and approximately 8 to 16 miles in the Whipple Mountains. In order to maintain and protect burro mule deer and most other desert wildlife species, all of the habitats they depend upon should be given high priority for protection in the Yuma District RMP-EIS.

The desert tortoise can also be used as an indicator species for wildlife using alluvial plains and wash habitats. If habitats are maintained in satisfactory condition for desert tortoises then chances are the habitats are suitable for most other forms of wildlife found there.

Recent data collected in California on desert tortoise (Berry and Nicholson, 1979) indicate that tortoise populations are highly fragmented due to urban development, agriculture, off road vehicle (ORV) use, grazing, utility and pipeline corridors, mining, roads, and other human activities.

We, therefore, recommend that the Yuma District identify areas where desert tortoise maintain reasonable population densities and include these areas under some form of habitat management program to perpetuate them. We feel that such a management program should include a plan for habitat preservation and enhancement. Particularly important in that plan will be the need to find a way to protect the species from ORV use and other activities that may degrade the habitat.

We further recommend that the Yuma District designate a Desert Tortoise Natural Area. This area should contain habitat suitable for tortoise and enhancement measures should be considered and implemented to make it better. At least a portion of the area should be fenced and ORV and other habitat-disturbing activities should be effectively controlled. This fenced area would produce benefits by providing a location where tortoises turned over to us by the public can be released safely. The controlled area would act as a "half-way" house or re-acclimatization site which would be needed before released tortoises, which may be carrying diseases, contact the wild population. The overall area would also provide a place for tortoise habitat improvements to be accomplished as mitigation for other actions.

-3-

Finally, we believe the Yuma District needs effective enforcement capability. Any Resource Management Plan which contains specifications to be met and/or prohibitions against certain actions is unlikely to have much success unless some means of enforcement is provided.

Our issue-by-issue comments are as follows:

Issue 1. Wildlife Habitat

This section needs to be enlarged to include the concept of "guilding" or the use of indicator wildlife species for an index of both habitat and animal welfare. The bighorn sheep is used in many desert mountain ranges as an indicator species. We recommend use of desert burro mule deer for desert wash and riparian habitats, and we recommend the desert tortoise be used for alluvial plain and desert washes. If discrete geographical areas can be set aside or designated specifically for management for these species as was done for bighorn sheep, further progress will be made for wildlife.

We will soon be able to provide copies of the State's "Management Plan for Desert Burro Mule Deer". This plan contains important guidelines for management which will enable BLM to focus on specific geographical areas and identified habitats which should be included in special management programs such as Areas of Critical Environmental Concern (ACEC) and Habitat Management Plans (HMP). The Plan has progressed to the point that we are certain that the Milpitas Wash area is a habitat complex which fits the criteria for special recognition. We, therefore, recommend it for designation similar to the designation to be used by BLM's California Desert Conservation Area. It is vital that its protection be carried eastward to the Colorado River. We believe the Desert District plans to designate Milpitas Wash as a Wildlife Area with a special HMP to preserve and enhance its valuable habitat associations.

We urge that BLM use and further develop its own data for the desert tortoise to identify and protect important geographical areas and habitat components which are essential for that species' preservation.

Issue 2. Special Management Areas

We recommend that the Whipple Mountain NA-3 area be included in some form of special designation, preferably as an ACEC, and a HMP adopted to protect and enhance the burro mule deer habitat values there.

The Laguna-Martinez (NA-12) area should also be included in some form of special designation, preferably ACEC and a HMP adopted to protect and enhance its fish and wildlife values.

-4-

Issue 3. Grazing
The custodial grazing lease in riparian habitats along the Colorado River near Blythe results in serious adverse impacts to habitat. Significant amounts of limbs of mesquite trees have been found cut down for cattle feed. These habitat areas provide nesting areas for large numbers of mourning and white-winged dove which are hunted by both Arizona and California residents. We believe the continuance of this grazing lease is not in the best interests of the habitat or the wildlife occupying it. We recommend it be cancelled as soon as possible.

Issue 4. Land Ownership Adjustments
We will support those land exchanges which would result in benefit to specific wildlife management programs.

Issue 5. Utility Corridors
We tend to have concern with power transmission lines crossing the Colorado River because bird strikes have been documented in the past. The Federally-listed Endangered Yuma clapper rail is a migratory species which could be at further risk from more power lines crossing the Colorado River. Ways need to be found to assure that such hazards to that species will not occur if new transmission lines cross the River.

Also, utility corridors crossing sensitive desert habitats and/or desert wash habitats are disruptive to them. They frequently result in so much public travel along the access roads that considerably more damage is added to that which is caused directly by the initial construction.

We recommend that no further corridors be established. Present and future projects within existing corridors should be designed and regulated in such a manner as to minimize, if not eliminate, increased public travel through sensitive desert habitats.

Issue 6. Recreation
BLM is one of many agencies and private enterprises providing recreational opportunity on the Colorado River. There are sections, such as the Parker Strip and the Lake Havasu area, where use saturation has already been reached.

We recommend that BLM conduct use surveys and set use-limits for areas under its jurisdiction. We believe ORV use, in particular, should be limited in some heavy-use sections adjacent to BLM concession developments, such as at Echo Lodge.

Issue 7. Wilderness
There are areas that had been considered for wilderness designation but that did not meet the full criteria. For these, we recommend that BLM establish some lesser designation that will still provide protection to the unique values for which the area was originally recognized.

SITE - SPECIFIC INFORMATION

for Yuma District Resource Management Plan

and Environmental Impact Statement

Chapter 3 - Affected Environment

P61. Whipple Mountains: The presence of mule deer in the Whipples should be noted. It should also be noted that deer numbers in the Whipples have seriously declined because of habitat losses near the Colorado River, primarily from development of a residential complex in an important summer concentration area.

P62. Big Maria Mountains: The last sentence in this section is incorrect. Bighorn sheep are no longer present in the Big Maria Mountains. However, it should be noted that because bighorn sheep historically occurred there, the Big Marias are a potential reintroduction site. It should also be noted that mule deer occur in the Big Marias but, due to habitat losses from agricultural and residential expansion along the Colorado River, their numbers have declined substantially.

P63. Add "burro deer" in discussion of both Milpitas Wash and Laguna-Martinez Unique Natural Area.

-5-

Executive Order 11988 on Floodplain Management should be interpreted stringently in order to preserve the integrity of floodplain habitat zones in the desert for their special natural values. Such interpretation should include use of the Order's preferred method of satisfying the requirement by avoiding development of sites on the base floodplain.

Offering the opportunity for multiple events on the Parker off-road race course in Arizona would be unwise because it may generate additional pressure to utilize the California section that way also. We do not favor multiple events on the California section.

In addition to the foregoing comments and concerns, we have attached specific information, referenced by page number that we believe will make more complete the information regarding particular sites referenced in the RMP and EIS.

We appreciate the opportunity to provide comments on this Draft RMP. If there are any questions, please contact Fred A. Worthley Jr., Regional Manager, Region 5, at 245 West Broadway, Suite 350, Long Beach, CA 90802-4467; (213) 590-5113.

Peter Batchelder
for Jack C. Parnell
Director

Attachment

-2-

P66. Dead Mountains Northern Addition: Bighorn sheep occur in the Dead Mountains. During surveys conducted in September 1984, a group of bighorn sheep were observed within one mile of the western edge of the WSA boundary. This should be noted.

--Chemehuevi Mountains Addition: Note that bighorn sheep occur in the Chemehuevi Mountains and their range extends into this area.

--Chemehuevi/Needles Addition: Note that mule deer occur in this area.

P67. Whipple Mountains Addition: Note that mule deer occur in this area.

P68. Big Maria Mountains Northern Addition: Note that mule deer occur in this area.

P69. Big Maria Mountains Southern Addition: Note that bighorn sheep have historically occurred in this area although they are no longer present. Also note that mule deer are present.

P70. Add "burro deer" to the discussion of the Little Picacho Peak Wilderness Study Area.

-3-

P71. Mule Deer: Note that mule deer populations are not stable. Hunter's tag returns and field surveys indicate deer numbers have declined substantially during the past 15 years on the California side of the Colorado River north of Blythe. This decline has continued in spite of favorable climatic conditions which have contributed to an upward trend in deer numbers south of Blythe during the past 10 years. Loss of habitat on critical summer concentration areas along the Colorado River is the primary reason for the decline. Specific deer herds affected include the Whipple Mountains herd, the Riverside Mountains herd and the Big Maria Mountains herd.

Chapter 4 - Environmental Consequences - General Impacts

Key Wildlife. P89, Table 4-11:

WSA 5-1 add bighorn sheep
WSA 5-3 " " "
WSA 5-4 " mule deer
WSA 5-10 " " "
WSA 5-18 " " "
WSA 5-19 " " "
WSA 5-35 " " "

Appendix B - Affected Environment

P193. Dead Mountains, North Addition (5-1) - Wildlife: The presence of bighorn sheep in the Dead Mountains should be noted.

354

BLM RECEIVED DISTRICT
MAY 17 4 5 PM
YUMA ARIZONA

MOHAVE COUNTY BOARD of SUPERVISORS
P.O. BOX 390 KINGMAN ARIZONA 86402

Dist 1 Hoge | Dist 2 Jack Rose | Dist 3 Jerry A. Holt | Dist 4 Dale L. D'Alessandro | Dist 5 Becky Foster

ARIZONA STATE OFFICE BLM LAND MANAGEMENT
MAY 14 85
ASD, AFF, ESD, RESOURCES, MINERALS, OPERATIONS, ADMIN, TRNG CNTR, FLAGSTAFF, CENT FILES

May 9, 1985

U.S.A. Dept. of Interior
Bureau of Land Management
Dean Bibles, State Director
3707 N. 7th St.
Phoenix, Arizona 85014

Dear Mr. ~~Bibles:~~ DEAN:

At it's Regular meeting of May 6, 1985, the Mohave County Board of Supervisors voted to oppose the proposed land transfer of Pittsburg Point in Lake Havasu City from the Bureau of Land Management to the Arizona State Land Department.

Thank you.

~~Sincerely,~~ Bibles

Jerry A. Holt, Chairman
Mohave Co. Board of Supervisors

RECEIVED
MAY 17 1985
Yuma District Office BLM
JAH/ay
DM, ADM, Planning, Pub Aff, Sp Prog Spec, Env Spec, Admin, Resources, Operations, YRA

-4-

P196. Chemehuevi/Needles Addition (5-4) - Wildlife: The presence of mule deer in this area should be noted.

P199. Whipple Mountains Addition (5-10) - Wildlife: THE PRESENCE OF MULE DEER IN THIS AREA SHOULD BE NOTED.

P206. Big Maria Mountains Northern Addition (5-18) - Wildlife: The presence of mule deer in this area should be noted.

P207. Big Maria Mountains Southern Addition (5-19) - Wildlife: The presence of mule deer in this area should be noted.

355

Yuma District Office BLM
DM, ADM, Planning, Pub Aff, Sp Prog Spec, Env Spec, Admin, Resources, Operations, YRA, NSA, ASD/AFF

BLM RECEIVED DISTRICT
MAY 15 12 57 PM '85
YUMA ARIZONA

ARIZONA STATE PARKS
1688 WEST ADAMS STREET
PHOENIX, ARIZONA 85007
TELEPHONE 602-255-4174

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STATE LAND COMMISSIONER

MICHAEL A. RAMNES
DIRECTOR

ROLAND H. SHARER
DEPUTY DIRECTOR

May 14, 1985

J. Darwin Snell, District Manager
Bureau of Land Management
P.O. Box 5680
Yuma, AZ 85364

Re: Comments on the "Draft Yuma District Resource Management Plan"

Dear Mr. Snell:

You will find the following to be Arizona State Parks Board comments on the Draft Yuma District Resource Management Plan. Our comments are a result of a review of the document and attendance at two hearings. For simplicity you will find our comments by the plans identified issues.

Issue 2: SPECIAL MANAGEMENT AREAS
The National Areas Advisory Council, an advisory committee to the Arizona State Parks Board, has identified the following areas within the Yuma District as possessing important natural values.

Aubrey Hills - listed on the State Natural Areas Register for its scenic, geological and wildlife values.

Cactus Plain - there are two state candidate natural areas within this area (Bouse Sand Hills and Black Peak Sand Hills). Both sites are noted for their unusual vegetation communities, sand hill formations and rare wildlife species.

Yuma Desert - a state candidate natural area noted for its unique landforms (dunes), plant communities and wildlife species.

The Natural Areas Advisory Council supports the designation of Research Natural Area for the three sand dune sites and Outstanding Natural Area/Scenic Area for the Aubrey Hills. Also, the Mohawk Mountains and associated sand dunes south of Interstate 8 are listed on the State Natural Area Register in cooperation with Luke Air Force Base. BLM's proposed designation of the mountain range's extension north of the highway as a natural scenic area would compliment existing management of the rest of the Mohawk Mountains.

CONSERVING AND MANAGING ARIZONA'S HISTORIC PLACES, HISTORIC SITES, AND RECREATIONAL, SCENIC AND NATURAL AREAS

-2-

It is the Council's recommendation that a designated research area should be fenced to exclude livestock grazing to enhance the value of the site as an experimental area. Livestock enclosures are rare in Arizona and their significance as research sites are invaluable. The Council would be very interested in working with the BLM in establishing appropriate boundaries for viable research areas on the above mentioned sites.

Issue 4: LAND OWNERSHIP ADJUSTMENT
Arizona State Parks Board endorses the proposed land exchange (involving Pittsburg Point, Windsor Area, Thompson Bay Area and Lower Oak Creek Site) between BLM, Arizona State Land Department and Arizona State Parks.

We believe, that in addition to this situation, every effort should be undertaken to assure that all private inholdings within the remainder of Lake Havasu State Park east to AZ Hwy 95 are acquired, through exchange process, by the Bureau of Land Management. The consolidation of Lake Havasu State Park south of "Contact Point" (T13N R20W S23 GSRBM, see attachment 1) should be imperative. The inevitable development of the private properties will only serve to segment the area and alter in a detrimental manner the public recreation, wildlife and visual resources that presently exist.

The Arizona State Parks has identified through a public planning process the desirability of extending the present boundaries of Lake Havasu State Park eastward to AZ Hwy. 95 (see attachment 1).

The Arizona State Parks Board recommends that all federal lands within the proposed Yuma Crossing Park be identified (see attachment 2). Once these lands are identified, we would encourage BLM to offer use of these lands to either the City of Yuma and/or Arizona State Parks for inclusion in the development of the "Yuma Crossing Park".

Issue 6: RECREATION
The Arizona State Parks Board recommends that BLM identify and file for necessary water rights along the Colorado River to assure existing and future public recreation use.

-3-

Issue 7: WILDERNESS
The Natural Areas Advisory Council supports the BLM's proposal to recommend the Chemehuevi/Needles WSA, Cactus Plain WSA and Kofa Unit 4 WSA as wilderness. However, the Council also supports these additional WSA's as wilderness:

Swansea
East Cactus Plain
Crossman Peak
Whipple Mountains Addition
Gibraltar Mountain
South Trigo Mountains
Trigo Mountains
Muggins Mountains

If these areas are not designated as wilderness, it is recommended that some appropriate special management prescription be applied to protect the inherent natural qualities of each of these areas.

If we may be of further assistance or you require clarification please do not hesitate to contact us.

Sincerely,

MICHAEL A. RAMNES
State Parks Board

MAR:jb

361

Valley Neurology Associates, Ltd.
Kenneth E. Root, D.O.

4244 North 19th Avenue
Phoenix, Arizona 85015
Telephone 263-9465

829 E. University Drive
Mesa, Arizona 85203
Telephone 834-9575

May 14, 1985

Yuma District
Bureau of Land Management
P. O. Box 5680
Yuma, Arizona 85364

To Whom It May Concern:

I recently have been made aware of the Bureau of Land Management's recommendations for wilderness designation for specific acres of land in Arizona including national forest and high desert wild lands. It is my understanding B.L.M. is requesting public comment on these recommendations.

I am sure as you will agree it is not necessary that I specifically outline in great depth and detail my support for the acreage of wilderness land in question. I would merely like to convey to you my complete wholehearted support for this effort as I am concerned about the preservation of our wilderness areas so that they may remain unspoiled for future generations.

I will be closely following the progress of these recommendations when they are reviewed by congress and hope the final decisions will be to preserve these designated wilderness areas.

Very Truly Yours,

Kenneth E. Root, D.O.

Yuma District Office
BLM
DM
ADM
Planning
Pub Aff
Sp Prog Spec
Env Spec
Admin
Resources
Operations
YRA
HRA
ACTION BY

KER/be
cc: Senator Barry Goldwater
Senator Dennis DeConcini
Congressman Eldon Rudd

366

United States Department of the Interior

BUREAU OF RECLAMATION
LOWER COLORADO REGIONAL OFFICE
P.O. BOX 427
BOULDER CITY, NEVADA 89005

IN REPLY REFER TO: LC-420
500.

Memorandum

To: District Manager, Yuma District Office, Bureau of Land Management, P.O. Box 5680, Yuma, Arizona 85365

From: Regional Director

Subject: Bureau of Land Management (BLM) Resource Management Plan

Alternatives to BLM's Resource Management Plan were discussed at a meeting held April 17, 1985, between representatives of BLM and staff from the Regional Office and the Yuma Projects Office of the Bureau of Reclamation.

We concur with BLM's preferred alternative to their resource management plan.

Roy W. Sear

Public Hearing Transcripts

ORIGINAL

BUREAU OF LAND MANAGEMENT HEARING

LAKE HAVASU CITY, ARIZONA
TUESDAY, FEBRUARY 26, 1985
7:00 P.M.

REPORTER'S TRANSCRIPT OF PROCEEDINGS

REPORTED BY: SUSAN E. POLEY, COURT REPORTER

A1

REPRESENT, IF YOU REPRESENT SOMEONE.

MR. JACOBSON: MY NAME IS BRUCE JACOBSON. I REPRESENT THE TOWN OF PARKER. I'M THE TOWN ENGINEER FOR THE TOWN OF PARKER, ARIZONA, AND THE ISSUES THAT I WOULD LIKE TO ADDRESS IS YOUR ISSUE NUMBER FIVE CONCERNING RIGHTS-OF-WAY.

THE QUESTION THAT WE HAVE IS RELATING TO THE TOWN OF PARKER. PART OF THE PARKER TOWN OF PARKER LIES WITHIN TOWNSHIP 8 NORTH, RANGE 19 WEST, THAT PORTION OF THE TOWNSHIP OUTSIDE OF THE INDIAN RESERVATION AND THE UTILITY CORRIDOR NUMBER 6, WHICH IS ON YOUR MAP NUMBER 8 GOES BASICALLY THROUGH THIS TOWN SITE.

WE BROUGHT A MAP AND IT KIND OF SHOWS THIS. THIS CORRIDOR GOES RIGHT THROUGH THE MIDDLE OF THE TOWN SITE IN THAT FASHION.

1

THIS IS A TOWN SITE THAT WE HAVE BEEN IN THE PROCESS OF DOING FOR THE PAST THREE OR FOUR YEARS, PLUS THE ENVIRONMENTAL STUDIES, AND EVERYTHING THAT GOES BACK FIVE OR SIX YEARS THAT WERE DONE BY THE UNIVERSITY OF ARIZONA.

I NOTICE THAT IN TALKING WITH SOME OF THE STAFF MEMBERS THAT THEY WERE AWARE OF THIS TOWN SITE AND, THEREFORE, THEY SUBMITTED AN ALTERNATIVE ROUTE WHICH YOU CALLED UTILITY CORRIDOR NUMBER 6B, AND YOU MOVED IT OVER TOWARDS THE EASTERLY EDGE OF OUR TOWN SITE.

I'M NOT SURE WHICH ONE IT WOULD REPRESENT, BUT

THE KOFA UNIT NUMBER 4, WHICH WAS STUDIED UNDER SLIGHTLY DIFFERENT AUTHORITY, THERE WILL BE NO ACTION RECOMMENDED ON THAT 980 ACRES; BUT, IF, HOWEVER, THE FISH AND WILDLIFE SERVICES DESIGNATE THE KOFA AS WILDERNESS, THE BLM IS PROPOSING TO TRANSFER THIS TO BE INCLUDED IN THEIR WILDERNESS AREA. THE PRELIMINARY RECOMMENDATION ON THE REMAINING 15 AREAS IS THAT THE AREAS ARE NOT SUITABLE FOR WILDERNESS.

I BELIEVE THAT CONCLUDES MY PRESENTATION.

MR. MCCLURE: THANK YOU, JIM.

IS THERE ANYONE HERE TONIGHT REPRESENTING GOVERNOR BABBITT?

(NO RESPONSE.)

MR. MCCLURE: ANYONE REPRESENTING ANY MEMBERS OF THE CONGRESS?

(NO RESPONSE.)

MR. MCCLURE: ANYONE REPRESENTING ANY MEMBER OF THE STATE LEGISLATURE?

(NO RESPONSE.)

MR. MCCLURE: ALTHOUGH I DID NOT SET A TIME LIMIT THIS EVENING, I WOULD APPRECIATE IT IF YOU WOULD TRY TO LIMIT YOUR COMMENTS TO APPROXIMATELY TEN TO 15 MINUTES.

YOU MAY SUBMIT WRITTEN STATEMENTS TONIGHT OR AT ANY TIME UP UNTIL APRIL 19, AND SO NOW I'LL CALL OUR FIRST WITNESS WHO IS MR. NORMAN JACOBSON.

IF YOU COULD PLEASE STATE YOUR NAME AND WHO YOU

1

THAT'S WHAT THIS DOES TO OUR TOWN SITE. WHAT WE WOULD LIKE TO SUGGEST TO YOU IS THAT YOU CONSIDER JUST MOVING--ELIMINATING UTILITY CORRIDOR NUMBER 6 AS EVEN A POSSIBILITY AND MOVING UTILITY CORRIDOR NUMBER 6B ONE MORE MILE TO THE EAST.

UTILITY CORRIDOR NUMBER 6B AS IT IS SHOWN ON YOUR MAP GOES ON THE EASTERLY ONE MILE SECTION OF TOWNSHIP 8 NORTH, RANGE 19 WEST; AND WE WOULD SUGGEST JUST RELOCATING THAT TO THE WESTERLY ONE MILE OF TOWNSHIP 8 NORTH, RANGE 18 WEST. WITH THAT CHANGE, I THINK THAT THEN THAT WOULD CLEAR THE TOWN OF PARKER AND KEEP IT OUT OF THE TOWN LIMITS OF THE TOWN OF PARKER. WE HAVE BEEN WORKING WITH THE BLM, THE STATE LAND DEPARTMENT ON THIS. WE ARE CURRENTLY GOING THROUGH ALL THE 17-STEP PROCESS WITH THE STATE OF ARIZONA, AND IT HAS BEEN A LONG PROCESS; AND AT THIS TIME, WE WOULD APPRECIATE IT IF YOU WOULD TAKE THAT INTO CONSIDERATION.

I THINK THAT'S ALL I HAVE, UNLESS YOU HAVE SOME QUESTIONS YOU WOULD LIKE TO ASK.

MR. MCCLURE: THANK YOU, MR. JACOBSON. I APPRECIATE IT.

OUR NEXT WITNESS IS GERALD HUNT.

A2

MR. HUNT: MR. HEARING OFFICER, I'M GERALD HUNT, AND I TOO REPRESENT THE TOWN OF PARKER AND WOULD LIKE TO AMPLIFY THE REMARKS MADE BY PARKER'S TOWN ENGINEER, MR. JACOBSON.

THE TOWN HAS BEEN GIVING THE CALLER OF THE AREA

19

TO THE PARKER TOWN SITE THAT WAS REFERRED TO IN MR. JACOBSON'S REMARKS. THE TOWN IS AWARE THAT IT IS NOT IN FACT A NEW TOWN SITE. IT'S PRIMARILY AN ANNEXATION OF THE EXISTING TOWN SITE.

TITLE 9, CHAPTER 4, ARTICLE 7 WAS AMENDED BY THE ARIZONA STATE LEGISLATURE ON JULY 27, 1983, AND THAT PARTICULAR AMENDMENT PROVIDES AS FOLLOWS: "NOTWITHSTANDING ANY PROVISIONS OF THIS ARTICLE, TO THE CONTRARY, ANY TOWN INCORPORATED PRIOR TO 1950 WHICH HAD A POPULATION OF LESS THAN 2,000 BY THE 1970 CENSUS AND WHICH IS BORDERED ON AT LEAST THREE SIDES BY INDIAN LANDS MAY ANNEX BY ORDINANCE TERRITORY OWNED BY THE STATE WITHIN THE SAME COUNTY FOR A NEW TOWN SITE WHICH IS NOT CONTIGUOUS TO THE EXISTING BOUNDARIES OF THE TOWN."

THIS PROVISION WAS ESPECIALLY INACTED FOR THE TOWN OF PARKER AND ALLOWS THE TOWN OF PARKER TO JUMP THAT ANNEX. PARKER WAS INCORPORATED IN JUNE OF '48 AND HAD LESS THAN 2,000 PEOPLE BY THE 1970 CENSUS AND IS COMPLETELY SURROUNDED BY THE RESERVATION FOR THE COLORADO RIVER INDIAN TRIBES.

ON MARCH 6, 1984, THE COMMON COUNCIL OF THE TOWN OF PARKER ADOPTED THEIR ORDINANCE, 179, AND IT ENCOMPASSED THE AREA DESCRIBED BY THE TOWN ENGINEER IN WHICH THE CURRENT UTILITY'S CORRIDORS ARE AT LEAST PROSPECTIVELY PLANNED.

THE ATTORNEY GENERAL FOR THE STATE OF ARIZONA ON APRIL 9, 1984 CERTIFIED THE PROCEDURE, WHICH THE TOWN HAD

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20

1 FOLLOWED, INCIDENT TO THAT ANNEXATION WHICH THE TOWN CONSIDERED TO BE AN INTEGRAL PART OF THE TOWN. OUR OBVIOUS CONCERN IS THAT YOUR UTILITY CORRIDORS DO NOT INVADE THE TOWN PROPERTY.

I'VE ASKED THE TOWN TO ALSO PROVIDE A LIST OF THE EXPENDITURES, WHICH THE TOWN HAS BEEN TO DATE, INCIDENT TO OUR NEW TOWN SITE, AND THAT TOTAL COMES TO $95,648.66. THESE EXPENDITURES STARTED FROM APRIL OF '78 AND CONTINUE TO DATE AND ARE CONTINUING.

THE TOWN ENGINEER HAS ONGOING EXPENSES THAT ARE AT LEAST AT THIS TIME $10,000, AND THERE'S BEEN EXTENSIVE REZONING FOR PROPER AND SOUND ZONING PROGRAMS FOR THE AREA BEFORE THE STATE LAND WILL AUTHORIZE THE SALE OF THE PROPERTY. THOSE FIGURES WE FEEL ARE IMPORTANT NOT ONLY TO SHOW THAT THE COMMITMENT TO THE TOWN OR BY THE TOWN HAS BEEN ONGOING BUT FOR THE TOWN OF PARKER, WHICH HAS A SUBSTANTIAL FINANCIAL COMMITMENT.

ONE COMMENT I ALSO FEEL THAT'S NECESSARY TO BE MADE IS THE RELATIONSHIP WITH THE INDIANS. AS I MENTIONED, WE ARE COMPLETELY SURROUNDED BY THE RESERVATION. ON DECEMBER 8, 1983, THE COLORADO RIVER INDIAN TRIBES BROUGHT AN ACTION IN THE UNITED STATES DISTRICT COURT, IN THE DISTRICT OF ARIZONA, FOR THE TOWN OF PARKER, WHICH RAISED SERIOUS QUESTIONS ABOUT THE TOWN'S JURISDICTION OVER ALL LAND WITHIN THE TOWN SITE.

AT THIS TIME, THE TOWN HAS FILED AN APPROPRIATE

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21

RESPONSE AND A COUNTERCLAIM. THE TOWN LOOKS FORWARD TO THIS LAWSUIT AS AN APPROPRIATE FORM TO WHICH TO RESOLVE THE UNCERTAINTY WHICH HAS BEEN CREATED BY THE COLORADO RIVER INDIAN TRIBES' CLAIMS TO JURISDICTIONS OVER PERSONS AND LAND WITHIN THE TOWN SITE.

THIS PARTICULAR MATTER IS SET FOR PRETRIAL CONFERENCE IN THE DISTRICT COURT ON MARCH 7 OF THIS YEAR, AND THERE IS ALSO AN APPEAL FROM AN EARLIER COURT IN THE SAME MATTER WHICH PLANS TO BE HEARD ON MARCH 14 BY THE U.S. COURT OF APPEALS IN SAN FRANCISCO.

IT IS ANTICIPATED THAT REGARDLESS OF THE OUTCOME THAT THIS MATTER WILL ULTIMATELY HAVE TO BE RESOLVED BY THE UNITED STATES SUPREME COURT. OUR CONCERN IS THIS: IF THE TOWN FAILS TO MAINTAIN ITS POSITION AND LOSES, IT IS REASONABLE TO ASSUME THAT DEVELOPMENT OF THE NEW TOWN SITE PROPERTY WILL HAVE A SIGNIFICANT IMPACT AND A REVIEW WHICH REQUIRES ADDITIONAL IMPACT AND THE EXPENDITURE OF ADDITIONAL FUNDS TO ACCELERATE ITS DEVELOPMENT.

WE ARE CONCERNED SINCE BOTH THE BLM AND THE BUREAU OF INDIAN AFFAIRS ARE INCLUDED IN THE DEPARTMENT OF INTERIOR THAT WE ARE HOPEFUL THAT THE DUTY WHICH YOU HAVE TO THE BUREAU OF INDIAN AFFAIRS WON'T INTERFERE IN ANY WAY WITH THE TOWN SITE'S DEVELOPMENT.

ONE LAST COMMENT THAT I HAVE HAS TO DO WITH THE SCORE 400 RACE WHICH WILL BE LATER DISCUSSED. THE TOWN

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22

WANTS TO MAKE IT A MATTER OF RECORD THAT IT WHOLEHEARTEDLY SUPPORTS THE SCORE 400. IT SUPPORTS THE EXISTING COURSE SITE AND IT SUPPORTS THE--HAVING MADE PERMANENT THE EXISTING COURSE SITE.

MR. EXAMINER, AT THIS TIME, I'D LIKE TO OFFER THE TOWN'S FIRST EXHIBIT, WHICH IS ORDINANCE 179, CERTIFIED BY THE ATTORNEY GENERAL ANNEXING THE LAND IN QUESTION; AND ALSO EXHIBIT NUMBER 2, WHICH IS THE ITEMIZED LIST OF THE TOWN OF PARKER'S EXPENDITURES INCIDENT TO THE DEVELOPMENT OF THAT LAND.

MR. MCCLURE: THANK YOU. OUR NEXT WITNESS WILL BE SAL FISH.

A3 MR. FISH: SAL FISH, PRESIDENT OF THE SCORE INTERNATIONAL. I WOULD LIKE TO REQUEST THAT YOU LEAVE THE SCORE PARKER 400 IN THE PLAN AS IT IS DESIGNATED AND THAT IN THE FUTURE THAT MYSELF AND MEMBERS OF THE COMMUNITY WOULD HAVE AN OPPORTUNITY AT LEAST SIX MONTHS IN ADVANCE TO REVIEW ANY ADDITIONAL STIPULATIONS THAT MIGHT BE PRESENTED UPON US ON THE COURSE ITSELF OR THE RUNNING OF THE RACE.

I FEEL THAT THERE'S A GOOD EXAMPLE: FOR THE LAST 12 YEARS OF AN ORGANIZATION SUCH AS THE SCORE INTERNATIONAL, THE COMMUNITY OF PARKER WITH THE--WITH THE BUREAU OF LAND MANAGEMENT AND DIFFERENT AGENCIES TO HAVE SUCH AN EVENT COME ABOUT, AND I THINK WE'VE PROVEN THAT WE CAN WORK TOGETHER, AND ONE IS THAT WE HAVE ENOUGH TIME TO BOTH KNOW WHAT IT

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IS WE'RE EXPECTING OF EACH OTHER.

AGAIN, I'D LIKE TO REQUEST THAT THE COURSE AS A--
AS DESIGNATED REMAIN IN THE PLAN. THAT'S IT. THANK YOU.

MR. MCCLURE: THANK YOU. BILL CHARNLEY.

A4 MR. CHARNLEY: MY NAME IS BILL CHARNLEY. I
HAVE A CONCESSION ON THE CALIFORNIA SIDE ON BLM LAND OF
THE PARKER STRIP AND WE WILL HAVE A FORMAL WRITTEN STATEMENT
THAT WE WILL BE PUTTING TOGETHER AND WHICH WILL BE MAILED IN
PLENTY OF TIME FOR OUR IDEAS OF DIFFERENT CONCESSIONAIRES.
THE REASON I'M UP HERE TONIGHT IS TO SUPPORT THE SCORE
400, WHICH HAS A DEFINITE FINANCIAL IMPACT TO OUR AREA
OF PARKER, AND AT THAT TIME OF THE YEAR, WE NEED THE BUSINESS.
THANK YOU.

MR. MCCLURE: THANK YOU. R.T. PEET.

MR. PEET: I'LL PASS IN LIEU OF A WRITTEN STATE-
MENT WHICH I'LL SUPPLY LATER.

MR. MCCLURE: THANK YOU. HERB GARLITZ.

A5 MR. GARLITZ: MY NAME IS HERB GARLITZ. I LIVE
AT BULLHEAD CITY, G-A-R-L-I-T-Z. I WANT TO THANK THE BLM
FOR GIVING US AN OPPORTUNITY TO COME AND EXPRESS OUR VIEWS.

I THINK THIS IS DEMOCRACY IN ACTION. WHEN I CAME IN
THE DOOR, MR. BELT ASKED ME WHO I WAS REPRESENTING, AND I
TOLD HIM I WAS JUST A LOOSE CANNON.

I WOULD LIKE TO SPEAK TONIGHT FOR SIX OR SEVEN
MINUTES ON THE PROBLEM OF GRAZING DOMESTIC LIVESTOCK ON THE

LOWER RAINFALL DESERT OF WESTERN ARIZONA. NOW, I'M SPEAKING
SPECIFICALLY ABOUT THE AREAS THAT HAVE FROM FOUR TO MAYBE
SIX INCHES OF AVERAGE ANNUAL RAINFALL.

I HAVE A COUPLE OF PAPERS THAT I WOULD LIKE TO
PRESENT TO KIND OF SUMMARIZE WHAT I'M GOING TO SPEAK ABOUT,
BUT I'D LIKE TO MAKE A MOTION OF MY REMARKS ABOUT THE ECONOMICS
OF GRAZING ON YOUR MORE ARID DESERT LANDS.

NOW, I DO HAVE TEN OR 12 COPIES OF THESE PAPERS,
WHICH I'LL PUT ON THE BACK TABLES FOR YOU FOLKS WHO ARE
INTERESTED IN THAT. AT LEAST TEN OR 12 OF YOU CAN GET THESE,
AND THEN I'M GOING TO ASK THAT THESE BE ENTERED AS PART
OF THE HEARING. SOME 30 YEARS AGO WHEN I WAS FARMING AND
RANCHING IN WEST TEXAS, I GRAZED CATTLE COMMERCIALLY ON
LOWER RAINFALL DESERT RANGE LANDS MUCH LIKE A GREAT DEAL
OF WESTERN ARIZONA.

I CAN ASSURE YOU THAT THE OPPORTUNITY FOR ECONOMIC
GAINS ARE NOT VERY MUCH. THE FEES THAT PRIVATE GRAZIERS
PAY TO THE PUBLIC FOR THE USE OF RANGES, THAT INCLUDES ALL
RANGES OF FOREST SERVICE AND THE BLM, ARE AT THIS PRESENT
TIME RELATIVELY SMALL, AND THERE'S NOT A GREAT RETURN TO
THE PUBLIC FOR THAT GRAZING.

NOW, WE DO NOT OPPOSE, AND, IN FACT, WE SUPPORT
GRAZING ON RANGE LANDS THAT SAY HAVE SEVEN INCHES OR MORE
EVERY JANUARY AND IN THE FALL. WE BELIEVE THAT MODERATE
AND WELL-MANAGED GRAZING ON SUCH LANDS IS CONSISTENT WITH

WILDLIFE VALUES AND THAT IT IS CONSISTENT WITH OTHER MULTIPLE
USES OF THE LAND.

WE FEEL--I'M NOT AN ENVIRONMENTALIST. I BELIEVE
THAT WE SHOULD USE OUR RESOURCES, BUT I THINK THE LOW RAINFALL
DESERT IS AN EXCEPTION, AND IN MOHAVE COUNTY WE HAVE 17
RAINFALL STATIONS THAT RECORD THE RAINFALL FOR THE AREA
THEY REPRESENT.

OUT OF THE 17, FIVE OF THOSE STATIONS ARE IN AREAS
THAT HAVE LESS THAN SEVEN INCHES OF RAINFALL; THREE ARE
IN AREAS THAT HAVE LESS THAN FIVE INCHES; AND TWO ARE IN
AREAS THAT HAVE AN AVERAGE ANNUAL PRECIPITATION OF LESS
THAN FOUR AND A THIRD INCHES PER YEAR. THOSE ARE THE AREAS
THAT I BELIEVE WE SHOULD NOT HAVE ANY GRAZING AT ALL OF
T2 LARGE DOMESTIC ANIMALS.

THERE'S A NUMBER OF ECOLOGICAL REASONS, AND WHEN
YOU THINK THAT THE PRIVATE RANCHER OR THE PRIVATE GRAZIER
THAT IS ATTEMPTING TO UTILIZE THOSE DESERT RANGES, OVER
THE LONG RUN, IS NOT GOING TO HAVE MUCH OF AN ECONOMIC GAIN
FROM IT, AND THE FACT THAT THE INFLUX OF PEOPLE IN WESTERN
ARIZONA HAS INCREASED THE VALUE OF THOSE KIND OF RANGES
FOR RECREATION AND FOR AESTHETIC REASONS, WE THINK THAT
ANY GRAZING FEES THAT MIGHT BE PAID TO THE PUBLIC BY THE
PRIVATE GRAZIER ARE SUBSTANTIALLY LESS THAN WHAT THE AESTHETIC
AND RECREATIONAL LOSS IS TO THE PUBLIC.

I'M SPEAKING ABOUT CAMPING, BACKPACKING, PHOTOGRAPHY,

YOU NAME IT. I KNOW MY WIFE AND I, EVERY YEAR WE SPEND
QUITE A FEW DAYS OUT IN THE LOWER RAINFALL DESERT. WE'RE
AMATEUR PHOTOGRAPHERS AND WE TAKE A GREAT DEAL OF PLEASURE
OUT OF TAKING PICTURES OF THE BLIZZARDS AND THE FLURRIES
AND THE SNAKES AND THE BIG HORN SHEEP, ESPECIALLY THE BIG
HORN SHEEP. I'M NOT GOING TO GO INTO A LOT OF ECONOMIC--
I MEAN ECOLOGICAL REASONS AND BIOLOGICAL REASONS OF WHY I
BELIEVE THAT LIVESTOCK GRAZING ON THOSE LIMITED AREAS THAT
I'VE TALKED ABOUT SHOULD NOT BE ALLOWED AT ALL, BUT THOSE
OF YOU WHO ARE INTERESTED MIGHT HAVE A CHANCE TO PICK UP
ONE OF THESE SHEETS FROM THE BACK TABLE. IT WILL EXPLAIN
IT MORE FULLY. THANK YOU.

MR. MCCLURE: THANK YOU. OUR NEXT WITNESS
IS GORDON GILBERTSON.

A6 MR. GILBERTSON: MY NAME IS GORDON GILBERTSON.
I'M HERE AS A TAX PAYER. I WANT TO SAY COUPLE OF WORDS.

I FEEL THAT THE EIS REPORT WAS VERY GOOD, AND I
AGREE ON THE AREAS FOR UNSUITABLE WILDERNESS IN THE CROSSMAN
PEAK AREA BECAUSE ALL THE AREA THERE I FEEL SHOULD BE
MANAGED UNDER A MULTIPLE USE ONLY, AND ESPECIALLY THE
CROSSMAN PEAK AREA BECAUSE OF THE MINERALIZED AREAS.

THANK YOU.

MR. MCCLURE: THANK YOU. I HAVE A DIFFICULT
TIME READING THIS NAME. PAT MCGUIRE?

MR. MCGUIRE: MCGUIRE. WE WILL SUBMIT OUR

27

COMMENTS LATER.

MR. MCCLURE: THANK YOU. DOROTHY MOERIKE.

A7 MS. MOERIKE: I AM DOROTHY MOERIKE AND WE ARE ALL TAX PAYERS AND I THINK THE PUBLIC SHOULD BE ABLE TO HAVE ACCESS TO THIS LAND. I AM SPEAKING--

A VOICE: PARDON ME, BUT COULD YOU PLEASE PULL THAT DOWN.

MS. MOERIKE: I THINK WE ALL PAY TAXES AND I THINK THE WHOLE PUBLIC SHOULD HAVE ACCESS TO THE PUBLIC LAND. I'M SPEAKING OF CROSSMAN PEAK IN GENERAL AND THE MINERALIZED AREAS.

THANK YOU.

MR. MCCLURE: THANK YOU. AUGUST MOERIKE.

A8 MR. MOERIKE: I'M AUGUST MOERIKE AND I'M ALSO A TAX PAYER. I'M INTERESTED IN THE CROSSMAN PEAK AREA. I THINK IT'S A GOOD IDEA ON THIS CONTROL RESOURCE AND ON ACCOUNT OF THE UNITED STATES GEOLOGICAL SURVEY THAT WE NEED CONTROL UP THERE.

AS FAR AS THE BEAUTIFICATION, I CAN'T REALLY UNDERSTAND THAT BECAUSE THERE AIN'T NO ROADS UP THERE, FOR ONE THING, AND YOU GET UP IN ANY OF THE HILLS AND YOU CAN SEE THE SAME THING. THANK YOU.

MR. MCCLURE: THANK YOU. DOTTIE RANDALL.

A9 1 MS. RANDALL: THANK YOU. I'D LIKE TO SPEAK TO THE ECONOMIC IMPACT OF THE SCORE 400 INTO OUR AREA. PAGE

28

1 77 OF THE YUMA DISTRICT RESOURCE MANAGEMENT PLAN DRAFT ADDRESSES AN ESTIMATE BY THE BUREAU OF THE VISITOR EXPENDITURES MADE IN THE LOCAL PARKER ECONOMY, INCLUDING EXPENDITURES FOR TEST RUNS BY PARTICIPANTS FOR THE SCORE 400 TO BE ABOUT $125,000.

A VOICE: WOULD YOU SPEAK MORE INTO THE MIKE.

MS. RANDALL: WE HAVE SEVERAL STATEMENTS WE WILL SUBMIT THAT MAY ASSIST IN REEVALUATING THAT EXPENDITURE AND THE LOCAL ECONOMIC IMPACT OF THE SCORE 400.

WE HAVE A LETTER FROM J.L. STECKMAN, MANAGER OF THE FIRST INTERSTATE BANK OF ARIZONA, PARKER BRANCH, WHEREIN HE STATES THAT HE'S RECEIVED DEPOSIT FIGURES FROM THE LOCAL FINANCIAL INSTITUTES AND IN AN ATTEMPT TO ASCERTAIN THE ECONOMIC IMPACT OF THE SCORE 400 IN THE PARKER AREA.

USING JANUARY 14 AS THE BASE INDICATOR, EACH SUBEQUENT WEEK'S DEPOSITS WERE TOTALED WITH THE FINAL WEEK BEING FEBRUARY 11. THE COMBINED INCREASE COMPARISON REFLECTS AN OVERALL INCREASE IN BANK DEPOSITS OF $1,751,000, WHICH MAY BE ATTRIBUTED TO THE SCORE 400.

A STATEMENT FROM WESTERN ARIZONA DISTRIBUTING, THAT THEIR PACKAGE SALES TO THE RETAILERS THE TWO WEEKS PRIOR TO THE RACE WERE INCREASED BY 75 PERCENT OVER THE FIRST TWO WEEKS OF THE MONTH. A DOLLAR INCREASE OF $25,216.

A STATEMENT BY BEARD'S CHEVRON GASOLINE STATION, STATING THAT THE GALLONAGE PUMPED DURING SCORE 400 WAS

29

INCREASED 14 PERCENT THIS YEAR OVER LAST YEAR AT THE SAME PERIOD AND THAT THE SCORE 400 WEEKEND IS THEIR BEST PERIOD. FIFTY-SIX PERCENT OF BEARD'S CHEVRON SALES ARE ON CREDIT CARD WHICH DO NOT REFLECT IN BANK DEPOSITS AS THEY ARE DEPOSITED WITH CHEVRON.

PDQ MARKET, SCORE WEEKEND, BUSINESS UP 40 PERCENT.

LAKE MANOR MARKET HAS PROVIDED PERCENTAGE INCREASES SINCE 1973 FOR THE SCORE 400 WEEKEND. 1985 WAS UP 26 PERCENT.

A & W ROOT BEER, A FAMILY RESTAURANT, SCORE WEEK, BUSINESS 300 PERCENT ABOVE NORMAL.

RIVER ISLAND MARKET, FEBRUARY 2, 3, AND 4, 1985, BUSINESS INCREASED 30 PERCENT.

DESERT DISTRIBUTING COMPANY, AVERAGE INCREASE FOR THE PAST FOUR YEARS, $20,300 TO RETAILERS PER YEAR.

CATTLEMEN'S RESTAURANT, BUSINESS UP SCORE WEEKEND 53 PERCENT.

LITTLE BROWN JUG, CONVENIENCE MARKET, BUSINESS SALES DOUBLED SCORE WEEKEND.

BRANDING IRON RESTAURANT AND THE VIP LOUNGE, SCORE WEEKEND AND PRETESTING, INCREASE PROFITS $8,000.

ANN THOMPSON, OWNER OF GRANDMA'S KITCHEN, PREPARED AN OPEN LETTER TO THE BUREAU OF LAND MANAGEMENT WITH SOME CONCERNS ON CLOSING AREAS TO SPECTATORS. ANN COPIED THE OPEN LETTER AND ACQUIRED 189 SIGNATURES OF INDIVIDUALS WHO ALSO HAVE THE SAME CONCERNS.

30

WE HAVE A COUPLE OF OTHER LETTERS THAT HAVE BEEN DIRECTED TO THE BUREAU THAT WE'RE ADDING. WE DON'T KNOW IF ONE OF THEM WAS ACTUALLY SENT TO THE BUREAU OR JUST TO US. THEY DO NOT HAVE ANY RELATION TO THE ECONOMIC IMPACT, BUT SINCE THEY'RE ADDRESSED AND ARE ADDRESSING THE SCORE, WE'RE GOING TO GIVE YOU THOSE, ALSO.

PETITIONS ARE BEING CIRCULATED IN OUR COMMUNITY, WHICH WILL BE PRESENTED TO THE YUMA DISTRICT OF THE BUREAU OF LAND MANAGEMENT, RELATING TO THE STIPULATIONS PLACED ON THE 1985 SCORE 400.

WE'RE AWARE THAT A VAST NUMBER OF INDIVIDUALS HAVE SIGNED THIS PETITION AND THAT THEY WILL BE SUBMITTED TO THE BUREAU WITHIN THE NEXT 30 DAYS. THEY'RE GOING TO BE SUBMITTED TO YOU BY LOCAL SERVICE ORGANIZATIONS.

I'D LIKE TO READ WHAT THE PETITION SAYS TO GET IT IN THE RECORD.

"THE FOLLOWING STATEMENT AND SIGNATURES CONSTITUTES A PETITION BY CONCERNED CITIZENS OF THE UNITED STATES OF AMERICA, WHICH WILL BE PRESENTED TO THE UNITED STATES GOVERNMENT, BUREAU OF LAND MANAGEMENT AND OTHER GOVERNMENTAL ENTITIES AND OFFICIALS, WHICH EXPRESSES OUR DISAPPROVAL OF THE STIPULATIONS PLACED ON THE 1985 SCORE 400 DESERT ROAD RACE IN PARKER, ARIZONA FOR THE FOLLOWING REASONS:

NUMBER ONE, STIPULATING WHERE THE PITS WILL BE LOCATED AND HOW THEY WILL BE ACCESSED ON RACE DAY, WITHOUT

HAVING CONSULTED THE RACING FRATERNITY OR THE SPONSOR, CREATE SAFETY PROBLEMS UNFORSEEN BY THE BUREAU OF LAND MANAGEMENT.

NUMBER TWO, FORECLOSURE OF LONG-TIME EXISTING ROADS TO BE PUBLIC USAGE IS INCONSISTENT OF THE BUREAU OF LAND MANAGEMENT'S POLICIES AND INFRINGES ON THE PUBLIC'S RIGHT TO THE USE OF THE PUBLIC LAND. IN ADDITION, OVERCROWDING IN THE DESIGNATED SPECTATOR AREAS CREATES A HAZARD TO THE HEALTH AND SAFETY OF ALL CONCERNED AND UNDOUBTEDLY IMPACTS THE LAND IN THOSE AREAS.

NUMBER THREE, EXCESSIVE CONTROLS ON RACERS AND SPECTATORS WILL DISCOURAGE INVOLVEMENT IN FUTURE EVENTS AND SEVERELY DAMAGE THE ECONOMY OF THE ENTIRE AREA, INCLUDING BLYTHE, CALIFORNIA AND LAKE HAVASU CITY, ARIZONA.

NUMBER FOUR, PROPOSED STIPULATIONS FOR FUTURE EVENTS SHOULD BE MADE AVAILABLE TO THE PUBLIC NO LATER THAN SIX MONTHS PRIOR TO THE EVENT AND PUBLIC HEARINGS HELD FOR INPUT FROM THE PUBLIC."

THANK YOU.

MR. MCCLURE: DENNIS, HAVE ANY OTHER PEOPLE SIGNED UP? IS THERE ANYONE IN THE AUDIENCE THAT WISHES TO SPEAK THAT HAS NOT SIGNED UP?

YOU MAY APPROACH THE PODIUM.

A10 MR. CUMMINGS: THANK YOU, MR. EXAMINER. MY NAME IS GEORE F. DAVIS CUMMINGS AND I'M FROM BULLHEAD CITY. I'M NOT HERE OFFICIALLY REPRESENTING ANY GROUP. I'M APPEARING

ESSENTIALLY AS A PRIVATE CITIZEN AND AT THE REQUEST OF SOME OF THE EXECUTIVE OFFICERS OF THE BULLHEAD CITY CHAMBER OF COMMERCE.

I'M CERTAIN MR. PETERSON IS AWARE THAT BULLHEAD CITY IS ONE OF THE MOST RAPIDLY GROWING AND DEVELOPING AREAS OF THE UNITED STATES AND INDEED UNDER SOME OF THE ALTERNATIVES AND PROPOSALS THAT HAVE BEEN BROUGHT FORTH, A NUMBER OF SECTIONS OF THE BLM MANAGED PROPERTY IN THE BULLHEAD CITY AREA ARE SLATED FOR DISPOSITION, WHICH MEANS THIS WILL ULTIMATELY BE EITHER TURNED OVER TO THE STATE OR MADE AVAILABLE FOR PRIVATE DELOPMENT.

HOWEVER, THERE ARE OF THE APPROXIMATELY NINE SECTIONS OF LAND IN THE BULLHEAD CITY VICINITY, THERE ARE SIX OF THEM THAT ARE IN THIS CATEGORY THAT ARE SLATED FOR DEVELOPMENT. THERE ARE THREE OTHER SECTIONS, AND THOSE ARE THE SECTIONS

1 I WISH TO ADDRESS ABOUT THIS EVENING.

THESE ARE LOCATED IN TOWNSHIP 20 NORTH AND THEY ARE SECTIONS 12, SECTION 30, AND SECTION 10, WHICH IS IN I BELIEVE RANGE--JIM, IF YOU COULD HELP ME. IS THAT 22 OR 23?

MR. MAY: TWENTY-TWO.

MR. CUMMINGS: THESE ARE THE THREE SECTIONS THAT HAVE RIVER FRONTAGE IN THEM. AGAIN, I'M GOING TO USE A GENERIC TERM. I'M AWARE OF THE SPECIFIC CLASSIFICATIONS, BUT THOSE ARE THE AREAS I WISH TO ADDRESS YOU IN REGARDS

TO THIS EVENING.

I BASICALLY WANT TO SAY THAT THERE IS SENTIMENT ON MY PART AND FROM MEMBERS OF THE CHAMBER OF COMMERCE WHICH MIGHT STRIKE YOU AS UNUSUAL, BUT THESE AREAS SHOULD BE HELD

1 FOR RECREATION AND PUBLIC PURPOSES, THAT THE EFFORTS OF MR. MAY AND MR. PETERSON IN MAKING THESE PARK AREAS AND BALL DIAMONDS AND THE CHAMBER OF COMMERCE AREAS ROTARY PARK WORKING WITH MR. ADAMS, WHO COULD NOT BE HERE THIS EVENING, AND COORDINATING WITH FISH AND GAME TO HAVE SECTION 10 MADE SOME SORT OF FISH AND WILDLIFE AREA; THAT THOSE EFFORTS SHOULD BE SUPPORTED AND THAT THEY SHOULD BE PART OF ANY ALTERNATIVE ADOPTED BY THE BUREAU, AND THAT IS ESSENTIALLY NOT ONLY TO THE CONTINUED DEVELOPMENT OF THE SECTION SLATED FOR DEVELOPMENT BUT TO THE WELL-BEING OF BULLHEAD CITY AS A COMMUNITY.

THERE IS A GREAT DEAL OF RIVER FRONT IN BULLHEAD CITY, BUT A GREAT DEAL HAS GOT VERY EXPENSIVE HOMES AND WEEKEND RETREATS BUILT ON THEM, BUT THOSE WHO ARE YOUNG AND CAN'T AFFORD A LOT OF RIVER FRONT PROPERTY, WE NEED THESE PUBLIC AREAS SET ASIDE, AND THE EFFORTS OF THE BUREAU OF LAND MANAGEMENT IN KEEPING THESE AREAS SET ASIDE NEED TO BE FURTHERED AND ENCOURAGED.

I JUST WANT TO EXPRESS MY PUBLIC EFFORTS IN HELPING WITH THE VARIOUS COMMUNITY ORGANIZATIONS, SUCH AS THE CHAMBER OF COMMERCE AND THE ROTARY CLUB AND ALL OTHERS THAT ARE

INVOLVED IN MAKING CERTAIN THAT THESE AREAS ARE SET ASIDE FOR RECREATION PURPOSES AND PUBLIC PURPOSES, AS OPPOSED TO AREAS SET ASIDE FOR SOME SORT OF PRIVATE INVOLVEMENT OR DEVELOPMENT.

THANK YOU.

MR. MCCLURE: THANK YOU.

MR. CUMMINGS: IF I MIGHT ADD ONE OTHER ITEM. I AM AN ATTORNEY BY TRADE AND THAT UNFORTUNATELY PUTS ME AT TIMES IN AN ADVERSARIAL REALTIONSHIP WITH THE TWO GENTLEMEN BACK THERE, AND I WANT TO EXPRESS MY PERSONAL SUPPORT FOR THEM AND EXPRESS MY HONEST FEELINGS THAT I HAVE REALLY IN ALL MY DEALINGS WITH VARIOUS GOVERNMENT MEMBERS, I'VE NEVER MET TWO GENTLEMEN WHO I FELT WERE MORE PROFESSIONAL AND MORE KNOWLEDGEABLE, AND I'M NOT GOING TO SAY ANYMORE IN FEAR THEY'LL GET PROMOTED AND WE'LL LOSE THEM.

THANK YOU.

MR. MCCLURE: IS THERE ANYONE ELSE THAT WISHES TO SPEAK?

(NO RESPONSE.)

MR. MCCLURE: IF NOT, I WANT TO THANK ALL OF YOU FOR ATTENDING THIS EVENING. YOUR VIEWS WILL BE PART OF THE PERMANENT RECORD WHICH WILL REMAIN OPEN FOR FURTHER STATEMENTS OR LETTER UNTIL APRIL 19, 1985.

AGAIN, IF YOU WISH TO WRITE, YOU SHOULD ADDRESS YOUR LETTER TO THE RMP TEAM LEADER, BLM, YUMA DISTRICT,

P.O. BOX 5680, YUMA, ARIZONA 85364.

THIS HEARING IS NOW CLOSED. THANK YOU VERY MUCH FOR YOUR ATTENDANCE.

(WHEREUPON THE BLM HEARING WAS CONCLUDED.)

(ORIGINAL)

PUBLIC HEARING UNDER THE AUTHORITY OF THE SECRETARY OF THE INTERIOR CONCERNING THE RESOURCE MANAGEMENT PLAN FOR THE BUREAU'S YUMA DISTRICT, HELD AT BLYTHE, CALIFORNIA, FEBRUARY 27, 1985, AT THE HOUR OF 7:00 P.M. AT RUTH BROWN SCHOOL CAFETORIUM, 241 NORTH 7TH STREET, BLYTHE, CALIFORNIA.

PREPARED FOR:

YUMA DISTRICT OFFICE, BLM

(ORIGINAL)

BORT COURT REPORTING SERVICE
REGISTERED PROFESSIONAL REPORTERS
150-A Court Street
Yuma, Arizona 85364
Phone: (602) 782-7591

BY: WILLARD J. BORT

B1

ANYONE REPRESENTING MEMBERS OF THE STATE LEGISLATURE? OUR FIRST WITNESS THIS EVENING IS GOING TO BE MR. DAVE ROBB. IF YOU COULD PLEASE COME UP TO THE PODIUM, PLEASE, STATE YOUR NAME AND WHO YOU REPRESENT, IF YOU REPRESENT SOMEONE.

MR. ROBB: MY NAME IS DAVE ROBB, R-O-B-B, AND I'M A TAXPAYER IN THE STATE. MY TESTIMONY TONIGHT IS TO ACTUALLY CONCUR WITH BOTH OF WHAT I HAVE HEARD OF BLM'S PLAN. I FEEL THAT THEY ARE DOING A LOT TO TRY AND KEEP THIS LAND IN MULTIPLE USE PLANNING, WHICH BENEFITS ALL OF US, AND ANY OF THEIR PLANS THAT IS NOT CONSISTENT WITH THIS I WOULD LIKE TO STRESS THAT I FEEL THAT IT'S WRONG TO TAKE PART OF THAT AREA OUT OF THE MULTIPLE USE AND PUT IT INTO A WILDERNESS AREA THAT CAN BE USED JUST FOR A FEW PEOPLE, LOTS OF PEOPLE BEING UNABLE TO GET INTO THE AREA DUE TO NOT HAVING ANY FACILITIES THAT THEY CAN GET IN THERE WITH, SUCH AS ROADS OR ANYTHING ELSE. ALSO, THE LIMITING THEN, AS I UNDERSTAND IN THE WILDERNESS AREA, OF SOME AWFUL GOOD MINING AREA UP THERE IN THE LAKE HAVASU AREA.

NOW I HAVE HEARD A LOT OF PEOPLE TALK ABOUT THAT AND I FEEL THAT IT'S WRONG IF THEY ARE GOING TO CLOSE IT OFF AND JUST HAVE IT FOR ONE BRANCH OF PEOPLE AND NOT GIVE ALL OF US A CHANCE TO PARTICIPATE IN THE USE OF WHAT WE ARE PAYING TAXES FOR.

THANK YOU VERY MUCH.

INDEX

	PAGE
MR. MCCLURE'S OPENING STATEMENT	3
MR. BELT'S PRESENTATION	8
PUBLIC COMMENTS	19
MR. MCCLURE'S CLOSING STATEMENT	33

B2

MR. MCCLURE: THANK YOU, MR. ROBB. RUTH ROBB, WOULD YOU LIKE TO SPEAK? OKAY. THE NEXT SPEAKER IS JOSEPH GABLER.

MR. GABLER: WELL, MY NAME IS JOE GABLER, AND LIKE A LOT OF YOU FOLKS, I SPEND SOME TIME DOWN HERE IN THIS AREA AND I PAY TAXES, AND THEN I SPEND SOME OF MY TIME UP NORTH AND PAY TAXES THERE. IN ANY EVENT, I'M PAYING TAXES.

LIKE WE HAVE ON ALL THE REST OF OUR FEDERAL LANDS, I'M PAYING MY SHARE ON THIS ONE AND I CONCUR WITH WHAT THE BLM IS DOING UP TO A CERTAIN POINT, AS LONG AS IT'S IN MULTIPLE USE.

NOW IF IT'S TURNED OVER TO THE WILDERNESS PEOPLE, AND WE HAVE SOME EXAMPLES OF THAT IN THE STATE OF WASHINGTON, AND PEOPLE WHO CARRY THESE THINGS AROUND (INDICATING) DON'T GET INTO THOSE AREAS BECAUSE YOU CAN'T GET THAT FAR AFOOT. I CONCUR WITH WHAT THE BLM IS DOING TO THE EXTENT THAT I THINK THAT THIS LAND SHOULD BE LEFT IN MULTIPLE USE SO WE ALL HAVE THE OPPORTUNITY TO ENJOY IT.

THANK YOU.

B3

MR. MCCLURE: CHARLES LAMB.

MR. LAMB: GOOD EVENING. I'M CHARLES LAMB, I'M THE MUSEUM DIRECTOR FOR THE COLORADO RIVER INDIAN TRIBES, AND THIS EVENING I'M HERE ON BEHALF OF THE TRIBES TO GET SOMETHING INTO THE ORAL TESTIMONY FOR THESE

21

HEARINGS.

THE COLORADO RIVER INDIAN TRIBES ARE A LANDOWNER, THEY OWN 270,000 ACRES DEAD CENTER WITHIN THE MIDDLE OF THIS STUDY AREA. THEY ARE ALSO A GOVERNMENT, AND THEY ALSO HAVE CULTURAL CONCERNS FOR ALL OF THE AREAS WITHIN THE YUMA DISTRICT BLM MANAGEMENT PLAN. BECAUSE OF THIS, THEY FEEL THAT THE CONTINUED INVOLVEMENT OF THE TRIBES WITH THE BUREAU OF LAND MANAGEMENT AT A VERY CLOSE LEVEL IS MOST IMPORTANT IN ORDER FOR THIS PLAN TO SUCCEED.

WE WILL, OF COURSE, SUBMIT WRITTEN STATEMENTS WHICH WILL BE FAR DETAILED AND GETTING INTO SOME OF THE CULTURAL AREAS AND CULTURAL CONCERNS THAT THE TRIBES HAVE, AS WELL AS AREAS OF CONCERN IN WILDERNESS, IN LAND USE.

ALL OF THE LAND PLANNING THINGS THAT THE BUREAU OF LAND MANAGEMENT HAS TO DEAL WITH, THEY ARE ALL CONCERNS OF THE TRIBES, SO WE WILL BE SUBMITTING THOSE COMMENTS. THE MAIN COMMENT HERE IS THAT WE DO NEED A VERY CLOSE INVOLVEMENT WITH THE BLM, AND WE'D LIKE THAT AT WHATEVER GOVERNMENTAL LEVEL IS POSSIBLE.

MR. MCCLURE: THANK YOU, MR. LAMB. EARL WICKERSHAM.

B4 MR. WICKERSHAM: I'M EARL WICKERSHAM AND I'M A TAXPAYER IN ARIZONA AND COLORADO, AND I ENDORSE BLM FINDING THE AREA UNFIT FOR WILDERNESS. I'M

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22

IN FAVOR OF MULTIPLE USE OF THE AREA.

I THANK YOU.

MR. MCCLURE: MARIE WICKERSHAM.

B5 MRS. WICKERSHAM: I'M A TAXPAYER ALSO IN ARIZONA AND COLORADO, THIS WAS MY HUSBAND SPEAKING BEFORE ME, AND I FEEL THE SAME, THAT WE SHOULD HAVE -- I ENDORSE THE BLM, FINDING THE AREA UNFIT FOR WILDERNESS, AND I'M IN FAVOR OF MULTIPLE USE OF THE AREA.

THANK YOU.

MR. MCCLURE: THANK YOU. BILL CHRESTMAN.

B6 MR. CHRESTMAN: MY NAME IS BILL CHRESTMAN, I'M A RESIDENT OF QUARTZSITE, ARIZONA, A TAXPAYER IN CALIFORNIA AND ARIZONA, AND I'M IN FAVOR OF THE MULTIPLE USE OF THE LAND THAT WE ARE TALKING ABOUT HERE.

THANK YOU.

MR. MCCLURE: THANK YOU. CLARENCE GRACELY.

B7 MR. GRACELY: MY NAME IS CLARENCE GRACELY, I'M A TAXPAYER IN THE STATE OF ARIZONA, NEW MEXICO AND OHIO, AND I WOULD LIKE TO SEE THE AREA REMAIN IN MULTIPLE USE, AS IT IS, FOR ALL TO ENJOY.

MY WIFE AND I HAVE ENJOYED IT FOR THE LAST SIX YEARS AND I WISH IT WOULD REMAIN THE SAME.

THANK YOU.

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23

MR. MCCLURE: MARGARET GRACELY.

B8 MRS. GRACELY: I'M MARGARET GRACELY AND I'M ALSO A TAXPAYER IN OHIO, NEW MEXICO AND ARIZONA, A CITIZEN OF THE UNITED STATES, AND I'M SECRETARY AND TREASURER OF THE QUARTZSITE SMALL MINERS AND OPERATORS ASSOCIATION, AND I ALSO WANT TO SEE THE AREA REMAIN AS IS, MULTIPLE USE, FOR EVERYONE TO ENJOY, AND I WANT TO POINT OUT THOUGH THAT THE TWO AREAS THAT ARE LISTED ON THE KOFA MAP, UNIT 3 AND UNIT 4, SHOULD REMAIN AS IT IS NOW AT THE PRESENT TIME AND NOT BE CHANGED.

I THANK YOU.

MR. MCCLURE: THANK YOU. DON MCKAY.

B9 MR. MCKAY: MY NAME IS DON MCKAY, I'M A RESIDENT AND TAXPAYER OF QUARTZSITE, ARIZONA, AND I HAVE WANDERED THROUGH THIS DESERT AN AWFUL LOT AND I HAVEN'T SEEN ONE-HALF OF IT YET. I WOULD LIKE TO BE ABLE TO WANDER THROUGH IT FREELY AND I WOULD LIKE TO SEE THIS REMAIN MULTIPLE USE FOR ALL OF US FOREVER.

THANK YOU.

MR. MCCLURE: THANK YOU. E. W. BECK.

B10 MR. BECK: MY NAME IS E. W. BECK AND I LIVE IN QUARTZSITE AND I'M A TAXPAYER AND I THINK THE BLM IS TRYING TO DO A WONDERFUL JOB HERE, AND I APPRECIATE

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24

WHAT THEY ARE TRYING TO DO, BUT I WOULD LIKE TO SEE ALL THIS REMAIN FOR MULTIPLE USE ONLY.

MR. MCCLURE: THANK YOU. HELEN BECK.

B11 MRS. BECK: I'M HELEN BECK FROM QUARTZSITE, ARIZONA, AND I'M AGAINST WILDERNESS AND I WOULD LIKE TO HAVE IT STAY AS IS.

THANK YOU.

MR. MCCLURE: THANK YOU. HAZEL VINCENT.

B12 MRS. VINCENT: I'M HAZEL VINCENT, I'M A TAXPAYER OF WASHINGTON AND ARIZONA ALSO, AND I WOULD LIKE TO HAVE THE LAND STAY AS IT IS AND NOT GO INTO THE WILDERNESS.

THANK YOU.

MR. MCCLURE: THANK YOU. DON TODD.

B13 MR. TODD: I'M DON TODD AND I'M A CITIZEN OF THE UNITED STATES LIKE THE REST OF THE PEOPLE AROUND HERE. I ALSO BELIEVE THAT WE SHOULD KEEP THIS AS IS INSTEAD OF CHANGING IT FOR JUST A FEW PEOPLE TO ENJOY, WHERE ALL OF THE REST OF US CAN HAVE OUR ENJOYMENT.

SOME PEOPLE -- IT LOOKS LIKE SOMEBODY WENT THROUGH A LOT OF EXPENSE AT TAXPAYERS' MONEY, SPENT A LOT OF MONEY HERE, SPENT A LOT OF TIME, USED A LOT OF

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THE TAXPAYERS' RESOURCES AND THAT TO MAKE IT BENEFIT A FEW.

MR. MCCLURE: THANK YOU. MARTIN JORDE.

B14 MR. JORDE: MY NAME IS MARTIN JORDE, STATE OF OREGON. AS A TAXPAYER OF BOTH OREGON AND ARIZONA I'M AGAINST PUTTING MORE LAND IN WILDERNESS AREA BECAUSE MULTIPLE USE WOULD SERVE A MUCH BETTER PURPOSE.

THANK YOU.

MR. MCCLURE: THANK YOU. BOB TODD.

B15 MR. TODD: I'M BOB TODD, AND I'M A CITIZEN OF THE UNITED STATES AND I PAY TAXES IN THE STATE OF WASHINGTON AND ARIZONA BOTH, AND I'D LIKE TO SEE IT STAY AS IT IS, UNDER LAND MANAGEMENT, WITHOUT THAT -- I CAN'T EVEN THINK OF IT NOW -- WITHOUT THAT OTHER USE. I DON'T CARE FOR THAT.

I'M LIKE THE GENTLEMAN -- I'M LIKE THE GENTLEMAN OVER THERE FROM WASHINGTON. I KNOW WHAT THIS BIRDWATCHING HAS DONE TO A WHOLE LOT OF OUR COUNTRY, BUT ONLY A FEW PEOPLE SEE.

THANK YOU.

MR. MCCLURE: THANK YOU. NATHAN JOHNSON.

B16 MR. JOHNSON: I'M NATHAN JOHNSON, TAXPAYER, AND I RESIDE IN QUARTZSITE, ARIZONA. I WOULD PREFER

TO LEAVE IT IN MULTIPLE USE INSTEAD OF CHANGING IT TO THE WILDERNESS AREA.

THANK YOU.

MR. MCCLURE: THANK YOU. MARILYN MCFATE.

B17 MRS. MCFATE: I'M MARILYN MCFATE FROM QUARTZSITE, ARIZONA, WHERE I RESIDE, AND I'D LIKE TO SEE THE CONTINUATION OF THE PRESERVATION AND MANAGEMENT OF THESE LANDS UNDER BLM AND COMPLETELY FORGET THE WILDERNESS PORTION OF IT ENTIRELY BECAUSE AT FIRSTHAND I HAVE SEEN WHAT IT'S DONE IN OTHER STATES. THE NIGHTMARES THAT HAVE COME UP THROUGH THE BUREAUCRATIC WAYS IS NOT NEEDED IN THIS AREA AT ALL.

MR. MCCLURE: THANK YOU. JOHN MCFATE.

B18 MR. MCFATE: I'M JOHN MCFATE. MARILYN DOES MOST OF THE TALKING IN OUR FAMILY, YOU CAN SEE THAT, BUT I WAS FORCED TO LEAVE MONTANA WHERE I WAS A TAXPAYER ALL MY WORKING LIFE AND I HAD TO COME SOUTH FOR MY HEALTH, AND I HAVE REALLY ENJOYED THE FREEDOM OF JEEPING AROUND. I CAN'T WALK ANYMORE AND WE JEEP AROUND AND WE HAVE A GOOD TIME AND WE CAN'T SEE WHERE WE'RE DOING ANY DAMAGE TO ANYTHING. I WOULD LIKE TO HAVE FREE USE AS WE HAVE SEEN IT SO FAR.

WE BOUGHT A PLACE IN QUARTZSITE AND ARE PAYING TAXES ON IT AND HOPE TO SPEND THE REST OF OUR

DAYS HERE, AND WE WOULD LIKE TO SEE THIS OPEN TO ROAM AS WE FEEL FREE TO DO SO.

I'D LIKE TO CITE A LITTLE DEAL IN MONTANA WHERE WE HUNTED FOR MANY YEARS AND THEY GOT A CLOSURE ON IT; IT WAS A REAL GOOD ELK HUNTING, WE COULDN'T GO IN WITH A JEEP SO MY HUNTERS WALKED A LITTLE BETTER THAN ME -- SHE ON TOP OF YOU AND SHE GOT CLEAR BACK INTO THIS AREA AND THE BIRDS THAT WERE RAMRODDING AND SEEING THAT NOBODY GOT IN THERE WERE PARKED BACK THERE AND ALL THEIR BUDDIES WAS HUNTING THAT LITTLE BUNCH OF ELK THAT SHE WENT BACK TO SEE IF SHE COULD KNOCK SOME OVER ON, AND WE HAD TO GET HORSES AND GET IT OUT, BUT THEY WERE DOING A GOOD JOB OF HUNTING IN THERE WHERE WE USED TO HUNT BEFORE THEY CLOSED IT. THANK YOU.

MR. MCCLURE: THANK YOU. BERTHA BOUCHER. DID I PRONOUNCE THAT RIGHT?

B19 MRS. BOUCHER: I'M BERTHA BOUCHER AND I'M A TAXPAYER AND I'M MUCH IN FAVOR OF THE MULTIPLE USE FOR ALL OF THE AREAS THAT ARE UNDER CONSIDERATION. THANK YOU.

MR. MCCLURE: THANK YOU. GENEVA ALLREAD.

B20 MRS. ALLREAD: MY NAME IS GENEVA ALLREAD AND I'M A TAXPAYER IN WASHINGTON AND ARIZONA, AND I'D LIKE FOR THE LAND TO REMAIN AS IS, MULTIPLE USE.

MR. MCCLURE: THANK YOU. L. K. MCWETHY.

B21 MR. MCWETHY: MY NAME IS LESLIE MCWETHY AND I PAY TAXES IN ARIZONA AND COLORADO, BUT I WANT THIS LAND TO STAY FOR MULTIPLE USE.

MR. MCCLURE: THANK YOU. WALTER KETCHUM.

B22 MR. KETCHUM: I'M WALT KETCHUM FROM QUARTZSITE, ARIZONA. I HAVE RESIDED THERE FOR THE LAST FOUR YEARS, TAXPAYER IN IDAHO AND ARIZONA, AND I WOULD REQUEST THIS BE LEFT IN MULTIPLE USE, THE LAND THAT'S UP NOW.

THANK YOU.

MR. MCCLURE: THANK YOU. O. J. WIKSTROM.

B23 MR. WIKSTROM. I'M O. J. WIKSTROM FROM THE STATE OF WASHINGTON. I'M LIVING DOWN IN QUARTZSITE NOW, AND I FEEL THAT THEY HAVE CLOSED OFF A LOT OF LAND AGAINST THE SENIOR CITIZENS THAT CAN'T HIKE BACK IN, IT'S JUST FOR THE YOUNG FELLOW, AND I'D LIKE TO SEE THE MULTIPLE USE FOR THE LAND INSTEAD OF JUST FOR A FEW.

MR. MCCLURE: THANK YOU. MRS. WIKSTROM, WOULD YOU LIKE TO SPEAK?

MRS. WIKSTROM: I JUST CONCUR.

MR. MCCLURE: BILL BOSTON.

B24 MR. BOSTON: I'M BILL BOSTON FROM THE STATE OF WASHINGTON, I'M DOWN HERE AT QUARTZSITE VISITING

29

WITH SOME WONDERFUL FRIENDS THAT I HAVE DOWN HERE. I'M A TAXPAYER, I'M PAYING TAXES DOWN HERE WHEN I BUY FUEL, REGARDLESS OF WHICH WAY I GO, AND I PAID TAXES AT HOME -- THEY ARE GETTING HIGHER EVERY YEAR -- BUT I'D LIKE TO SEE THIS LAND STAY TO WHERE WE SENIOR CITIZENS CAN GO WHEREVER WE WANT TO WITHOUT HAVING TO WALK BECAUSE WE GET TO THE POINT OF WHERE WE CAN'T WALK WHEN WE GET A LITTLE OLDER.

THANK YOU.

MR. MCCLURE: THANK YOU. DAVID TRENHOLM.

B25 MR. TRENHOLM: MY NAME IS DAVID TRENHOLM AND I, LIKE A LOT OF OTHER SENIOR CITIZENS, CAN'T DO A LOT OF HIKING. WHERE MY BAJA BUG WON'T TAKE ME I CAN'T GO. I'D LIKE TO SEE THIS LAND STAY LIKE IT IS SO I CAN ROAM AROUND AND DO WHAT I WANT TO DO.

THANK YOU.

MR. MCCLURE: JACK BROCK.

B26 MR. BROCK: I'M JACK BROCK, I HAVE LIVED IN EHRENBERG FOR THIRTY YEARS. I WOULD LIKE TO SEE IT STAY, THE LAND AND EVERYTHING, STAY IN MULTIPLE USE. I THINK WE HAVE ENOUGH WILDERNESS AREAS WHERE WE CAN'T GO.

THAT'S ALL.

MR. MCCLURE: THANK YOU. LILY HEATLEY.

B27 MRS. HEATLEY: I'M LILY HEATLEY

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30

AND I'M A TAXPAYER AND I SPEND MY WINTERS IN QUARTZSITE, AND I WOULD LIKE TO SEE THE LAND USED IN MULTIPLE USE BECAUSE WE REALLY ENJOY IT DOWN HERE IN THE WINTERTIME.

THANK YOU.

MR. MCCLURE: THANK YOU. CHARLES HEATLEY.

B28 MR. HEATLEY: WELL, I'M A TAXPAYER IN ARIZONA AND I'M ALONG WITH ALL THE REST OF THEM; KEEP IT OPEN TO EVERYBODY.

MR. MCCLURE: THANK YOU. FRANK DOKTER.

B29 MR. DOKTER: I'M FRANK DOKTER AND I REPRESENT WALTER'S CAMP. MY INTERESTS HERE ARE A LITTLE BIT DIFFERENT THAN WHAT WE HAVE BEEN HEARING SO FAR. BEING WE OWN A CAMPGROUND I'D LIKE TO CALL YOUR ATTENTION TO ITEM NUMBER SIX, AND IT PERTAINS TO THE LENGTH OF STAY OF DIFFERENT

1 PROPERTIES, AND IT'S A BIG CONCERN OF OURS BEING WE DO HAVE A SIZABLE INVESTMENT IN THIS PARTICULAR AREA.

WE'D LIKE THE LENGTH OF STAY TO BE EXTENDED FROM FIVE MONTHS TO NINE MONTHS SO THAT IT WOULD ALLOW US TO EARN A RETURN ON OUR INVESTMENT.

THANK YOU VERY MUCH.

MR. MCCLURE: THANK YOU. PATTY DOKTER, WOULD YOU LIKE TO SPEAK? OKAY. BETTY CONZELMANN.

B30 MRS. CONZELMANN: I'M BETTY

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31

CONZELMANN FROM BRANDA, ARIZONA, AND I HAVE LIVED HERE FOR TWELVE YEARS, AND WANT THIS LAND TO BE USED AS MULTIPLE USE. I'D HATE TO THINK THAT I COULDN'T GO OUT TO MY CLAIM AND DIG SOME GOLD AND I HAVE LOTS OF FRIENDS THAT COME DOWN HERE AND WE ROAM THE DESERT VERY YEAR AND I THINK IT WOULD BE TERRIBLE TO CLOSE ANY PART OF IT OFF.

MR. MCCLURE: THANK YOU. CHET HUNT.

B31 MR. HUNT: I'M CHET HUNT AND I'M A RESIDENT OF THIS STATE AND I HAVE A MINING CLAIM OVER IN ARIZONA AND I ALSO BELONG TO THE PROSPECTORS AND SMALL MINERS ASSOCIATION OF ARIZONA, AND I WOULD LIKE FOR THE LAND TO STAY OPEN FOR THE MINERALS THAT WE NEED IN OUR WHOLE NATION FOR DEFENSE USE AND DOMESTIC USE, AND WOULD LIKE TO SEE THE LAND STAY OPEN FOR MULTIPLE USE.

I THANK YOU.

MR. MCCLURE: THANK YOU. SAMUEL HEFLIN.

B32 MR. HEFLIN: I'M SAMUEL HEFLIN, I HAVE BEEN IN THE VALLEY SINCE 1946, I PAY TAXES IN CALIFORNIA AND ARIZONA, AND I AGREE WITH THE BUREAU IN THE USE OF LANDS AS A MULTIPLE USE DEAL. I FEEL IT'S GOING TO BE CHEAPER FOR THE TAXPAYERS, LESS EXPENSIVE THAN TO CONTROL THE WILDERNESS, AND THAT'S WHAT WE ARE LOOKING FOR, LESS EXPENSE.

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32

MR. MCCLURE: THANK YOU. JAMES GEORGE.

B33 MR. GEORGE: I'M JAMES GEORGE, TAXPAYER, AND I AGREE WITH THE BLM RECOMMENDATION ON THE STUDY AREA, AND I STILL THINK IT CAN BE BETTER MANAGED BY MULTIPLE USES.

MR. MCCLURE: THANK YOU. JIM ATKIN, IS THERE ANYONE ELSE THAT HAS SIGNED IN THAT WISHES TO SPEAK?

MR. ATKIN: NO.

MR. MCCLURE: IS THERE ANYONE ELSE IN THE AUDIENCE THAT WOULD LIKE TO SPEAK AT THIS TIME?

WOULD YOU LIKE TO RAISE YOUR HAND IF THERE IS. YES, MA'AM. WOULD YOU LIKE TO COME TO THE PODIUM?

B34 MRS. HOUGHTALING: I'M A TAXPAYER IN TWO COUNTIES.

MR. MCCLURE: MA'AM, COULD YOU STATE YOUR NAME, PLEASE.

MRS. HOUGHTALING: OH, I'M SORRY. MRS. HOUGHTALING.

MR. MCCLURE: COULD YOU SPELL IT FOR ME, PLEASE.

MRS. HOUGHTALING: H-O-U-G-H-T-A-L-I-N-G.

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MR. MCCLURE: THANK YOU VERY MUCH. GO AHEAD.

MRS. HOUGHTALING: I'M A TAXPAYER IN TWO COUNTIES IN ARIZONA, AND I'M ALSO FOR THE MULTIPLE USE OF THESE AREAS, BUT I WANTED TO ADD ANOTHER LITTLE BIT, A LITTLE SCUTTLEBUTT I HEARD. WE HAVE AN ACREAGE IN MOHAVE COUNTY AND I HAVE BEEN TOLD THAT IF THEY WANTED TO THEY CAN MOVE OUT THERE TOO, AT LEAST ACROSS THE PEAK, AND TAKE THAT FROM US EVEN THOUGH WE OWN IT.

MR. MCCLURE: THANK YOU. YES, MA'AM.

B35 MRS. PARKER: I'M DORIS PARKER, AND I ALSO LIVE IN QUARTZSITE AND I'D LIKE TO SEE IT LEFT AS MULTIPLE USE. I HAVE LIVED THERE FOR ELEVEN YEARS AND I'M A TAXPAYER ALSO.

MR. MCCLURE: THANK YOU.

B36 MR. BRIDGE: I'M ALLEN C. BRIDGE AND I WOULD LIKE TO SEE THE LANDS STAY AS THEY ARE, MULTIPLE USE.

THANK YOU.

MR. MCCLURE: IS THERE ANYONE ELSE WHO WISHES TO SPEAK? IF NOT, I WANT TO THANK ALL OF YOU FOR ATTENDING THIS EVENING. YOUR VIEWS WILL BE PART OF THE PERMANENT RECORD WHICH WILL REMAIN OPEN FOR FURTHER STATEMENTS OR LETTERS UNTIL APRIL 19, 1985.

AGAIN, IF YOU WISH TO WRITE, YOU SHOULD ADDRESS YOUR LETTER TO THE RMP TEAM LEADER, BUREAU OF LAND MANAGEMENT, YUMA DISTRICT, P.O. BOX 5680, YUMA, ARIZONA, ZIP CODE 85364.

WE REALLY APPRECIATE THE ATTENDANCE TONIGHT AND YOUR PARTICIPATION, AND I WANT TO THANK ALL OF YOU FOR COMING. THIS HEARING IS NOW CLOSED.

(WHEREUPON, THE HEARING CONCLUDED AT 9:10 P.M. CALIFORNIA TIME.)

PUBLIC HEARING UNDER THE AUTHORITY OF THE SECRETARY OF THE INTERIOR CONCERNING THE RESOURCE MANAGEMENT PLAN FOR THE BUREAU'S YUMA DISTRICT, HELD AT YUMA, ARIZONA, FEBRUARY 28, 1985, AT THE HOUR OF 7:00 P.M. AT THE YUMA CIVIC CENTER, 1440 DESERT HILL DRIVE, YUMA, ARIZONA.

PREPARED FOR:

YUMA DISTRICT OFFICE, BLM

BORT COURT REPORTING SERVICE
REGISTERED PROFESSIONAL REPORTERS
150-A Court Street
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BY: GERRY BYRNES

ANY ACTION ON THAT 980 ACRES PENDING THE KOFA NATIONAL WILDLIFE WILDERNESS PROPOSAL. AND OUT OF THE 18 AREAS WE HAVE PRELIMINARILY RECOMMENDED THAT 15 ARE UNSUITABLE. EIGHT HAVE PROTECTION FROM SOME OF THESE OTHER ISSUES THAT I HAVE DISCUSSED AND THAT TOTALS SOME 125,000 ACRES.

BASICALLY WE ARE AT THE SITUATION RIGHT NOW WHERE WE ARE ASKING FOR YOUR INPUT. THIS IS THE REMAINING PLAN PROCESS IN OUR SCHEDULE. WE ARE IN THE REVIEW OF THE DRAFT SITUATION RIGHT HERE. APRIL 19 IS THE CLOSING DATE FOR COMMENTS, THEN WE WILL LOOK AT YOUR COMMENTS. WE WILL SEE IF WE HAVE MISSED ANYTHING AND WE WILL PREPARE AND DISTRIBUTE THE FINAL R AND P EIS TO THE PUBLIC. AND A FINAL DATE FOR THAT WILL BE JULY 31, 1985.

THERE WILL BE A PROTEST PERIOD THEN WRITTEN INTO THE DIRECTOR AND THIS AGAIN, SEPTEMBER 16, IS THE DEADLINE FROM WHICH TO SUBMIT THESE PROTESTS. AND BY SEPTEMBER 31, 1985, WE WILL BEGIN MANAGING ACCORDING TO THE PLANNED DECISIONS. AND THAT CONCLUDES MY PRESENTATION, BEAU.

MR. MCCLURE: THANK YOU, ALLAN. IS THERE ANYONE HERE REPRESENTING GOVERNOR BABBITT? GOVERNOR DEUKMEJIAN? ANY MEMBERS OF CONGRESS? ANYONE REPRESENTING MEMBERS OF THE STATE LEGISLATURE?

OUR FIRST WITNESS THIS EVENING IS GOING TO BE P.A. BIRDICK. YOU COULD PLEASE COME TO THE PODIUM, STATE YOUR NAME AND WHO YOU REPRESENT, IF YOU DO REPRESENT

INDEX

	PAGE
MR. MCCLURE'S OPENING STATEMENT	3
MR. BELT'S PRESENTATION	7
PUBLIC COMMENTS	16
MR. MCCLURE'S CLOSING STATEMENT	48

C1

SOMEONE.

MR. BIRDICK: YES, I AM CONCERNED ABOUT THE --

MR. MCCLURE: EXCUSE ME. COULD YOU STATE YOUR NAME?

MR. BIRDICK: BIRDICK, B-I-R-D-I-C-K, INITIALS P.A., LIVING IN YUMA FOR THE PAST 38 YEARS.

MR. MCCLURE: THANK YOU.

MR. BIRDICK: OWNER OF THE KING OF ARIZONA MINE. AND I AM CONCERNED ABOUT THE LOCKING OUT OF THE POTENTIAL MINING AREAS BECAUSE I'M AFRAID THAT SOME OF OUR RESOURCES WILL BE PERMANENTLY KEPT AWAY FROM POSSIBLE USE.

I WOULD USE AS AN EXAMPLE THE PROPERTY ABOUT 20 MILES OR SO WEST OF YUMA WHERE GOLDFIELD HAS SPENT IN THE LAST COUPLE OF YEARS WELL OVER, WHAT? TWO MILLION IN CORE DRILLING ALONE. AND THERE IS A HUGE DEPOSIT OF LOW GRADE ORE THERE WHICH IS GOING TO PROVIDE GOLD WHICH THIS COUNTRY NEEDS TO BACK OUR DOLLAR AND PROVIDE A LOT OF JOBS FOR A LOT OF PEOPLE AND ITS FINAL PRODUCT WILL NOT HARM THAT COUNTRY OUT THERE.

IT'S JUST RAW DESERT LAND IN GENERAL, BUT TEN YEARS AGO THAT PROPERTY, 20 YEARS AGO, WOULD HAVE BEEN CONSIDERED AND LABELED BY MANY GEOLOGISTS EVEN AS BEING IMPRACTICAL FOR MINING BECAUSE THERE WAS NOT ENOUGH GOLD THERE.

18

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BUT DURING RECENT YEARS AND WITH THE EXAMPLE OF THE WORK BEING DONE IN CARLIN, NEVADA, USING HUGE MACHINERY AND CERTAIN LEACHING PROCESSES, IT HAS BEEN MADE PRACTICAL.

IN OTHER WORDS -- THERE WAS A VERY FINE ARTICLE IN FORTUNE MAGAZINE A COUPLE OF YEARS AGO EXPLAINING THAT, BUT THAT PROPERTY HELD BY GOLDFIELD WHICH FORMERLY WAS KNOWN AS THE MESQUITE DIGGINGS IS GOING TO PROVIDE, I'M SURE, WELL OVER 150 MILLION, I THINK WOULD BE A VERY CONSERVATIVE FIGURE, IN OUTPUT AND PROBABLY MUCH MORE THAN THAT.

NOW THERE ARE OTHER AREAS THAT IS WITHIN THE AREA BETWEEN THE PROVING GROUND AND THE COLORADO RIVER AREAS NORTH OF BETWEEN HIGHWAY 10 AND THE PRESENT KOFA GAME REFUGE THAT WILL BE LOCKED AWAY FROM FUTURE CLAIMS. IN OTHER WORDS, IT WILL NO LONGER BE MULTIPLE USE; WHEREAS, AT THE PRESENT IT IS MULTIPLE USE.

TODAY IF SOMEONE GOES OUT THERE AND FINDS SOMETHING REAL WORTHWHILE, THEY CAN PUT A CLAIM ON IT. AFTER THE ACTION THAT YOU HAVE PROPOSED HERE, DID I UNDERSTAND IT CORRECTLY, THEN IT WILL NOT BE POSSIBLE, REGARDLESS OF HOW VALUABLE A THING YOU FIND OUT THERE. IT WILL BE IMPOSSIBLE TO PUT A CLAIM ON IT. IT WILL NOT BE MULTIPLE USE, JUST AS IN THE PRESENT KOFA GAME REFUGE, THE LAND THAT IS IN THE GAME REFUGE NOW CAN ONLY BE MINED, ONLY THOSE MINES CAN BE MINED THAT WERE ESTABLISHED BEFORE 1974,

19

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AND I'M WORRIED FOR FEAR WE ARE LOCKING SOME THINGS OUT THAT IN FIVE YEARS, TEN YEARS, WITH ADVANCED GEOCHEMICAL AND OTHER SPECIAL GEOPHYSICAL METHODS OF TESTING, WE WILL DISCOVER THAT THERE IS SOMETHING, PERHAPS A LARGE COPPER DEPOSIT OR SOMETHING ELSE THAT THIS COUNTRY NEEDS.

SO I HESITATE TO SEE IT LOCKED AWAY. AND THAT WAS THE REASON I WANTED TO MAKE THIS PARTICULAR STATEMENT.

C2

MR. MCCLURE: THANK YOU, MR. BIRDICK. KEN OMEY.

MR. OMEY: I'M NOT A VERY GOOD SPEAKER. MY NAME IS KEN OMEY. I HAVE BEEN IN YUMA EIGHT YEARS AND I AM PRIMARILY CONCERNED WITH MINING CLAIMS, THE SAME AS MR. BIRDICK, AS BEING AS WE HAVE SEEN THAT THE GOVERNMENT TENDS TO TAKE A LITTLE LAND AND TURN IT INTO WILD LIFE REFUGES, TO WHATEVER ELSE USE THEY WANT TO PUT IT TO AND CLOSE OUT THE LITTLE MAN THAT IS OUT THERE ACTUALLY USING THE LAND ITSELF, PUTTING IT TO A GOOD PURPOSE.

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I AM ALSO CONCERNED WITH THE ECONOMIC COST IN ENFORCING SOME OF THE AREAS THAT IS ACTUALLY UP FOR PROPOSAL. ONE THAT COMES TO MIND IS KIND OF A SMALL THING, WOULD BE THE FIREWOOD COLLECTION ISSUE.

SAY, IF YOU ARE CAMPING AND YOU HAVE A FAIRLY WELL-TO-DO OR SET CAMPING SPOT, HOW WILL THEY ENFORCE THE ISSUE OF YOU COLLECTING WOOD ON THE AREA? WOULD THEY

20

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ISSUE YOU A TICKET ? WOULD IT TAKE MORE MEN TO THE BLM TO RUN THE AREA? ARE YOU GOING TO HAVE TO HIRE MORE PEOPLE?

ANOTHER THING IS WHAT I WOULD REALLY LIKE TO SEE AND THE ACTUAL FACTS ON AN ENVIRONMENTAL IMPACT STATEMENT CONCERNING THE DESERT SHEEP. THE LAND THAT IS NOW SET ASIDE FOR THE SHEEP, I FEEL, IS FAIRLY ADEQUATE.

WE HAVE HAD NINE TO TEN INCHES OF RAINFALL THIS YEAR. THERE IS ADEQUATE FOOD FOR THEM. THE EXTRA LAND MIGHT BE AS THE GOVERNMENT WILL PUT A SAFETY VALVE JUST IN CASE OF A DROUGHT SITUATION.

BUT IF ANYBODY HAS BEEN OUT ON THE DESERT, AND I KNOW ALL OF US HAS HERE, SEEING THE DESERT SHEEP, I HAVE TALKED TO A LOT OF PEOPLE. NOT A LOT OF PEOPLE SEE THEM.

THERE IS, I DON'T KNOW THE ACTUAL HERD COUNT, BUT SETTING ASIDE AN EXTRA PARCEL OF LAND FOR THE SHEEP COULD OR COULDN'T BE A GOOD SITUATION. THAT'S ABOUT ALL I'VE GOT TO SAY. I'M SORRY TO SEE IT COME ABOUT.

MR. MCCLURE: THANK YOU. MAYNARD CAMPBELL.

C3

MR. CAMPBELL: GENTLEMEN AND LADIES, I WOULD LIKE TO START OFF FIRST BY GETTING YOUR THOUGHTS TO KIND OF GO WITH WHAT I'M TRYING TO SHOW HERE. TO USE AN EXAMPLE, IF YOU GO OUT SOMEWHERE AND, SAY, YOU VISIT LOS ANGELES OR WHATEVER YOU WANT TO GO TO FROM ONE PLACE TO

21

ANOTHER, OR IF YOU DON'T HAVE YOUR OWN VEHICLE, FIRST THING YOU DO NORMALLY IS RENT A CAR. SO YOU GET IN YOUR CAR YOU HAVE RENTED AND GET ON THE FREEWAY. IF YOU ARE LIKE MOST PEOPLE, IF THERE IS A BUNCH OF CARS COMING YOU ARE NOT GOING TO WORRY TOO MUCH BECAUSE IT IS SOMEBODY ELSE'S CAR, RIGHT?

THAT'S THE IMPORTANT THING, IF YOU GO OUT AND BUY YOUR OWN CAR AND IT'S BRAND NEW AND YOU GO TO GET ON THE FREEWAY, YOU ARE GOING TO BE VERY CAREFUL AND CAUTIOUS WITH IT AGAIN BECAUSE WHO OWNS THE VEHICLE? IT MIGHT NOT SEEM PERTINENT, BUT LET'S GO ON.

THERE ARE A NUMBER OF THINGS THAT RAISES US FROM THE LEVEL STONEAGE PEOPLE. BASICALLY IT BOILS DOWN TO NATURAL RESOURCES, HUMAN EFFORT, AND TOOLS.

NATURAL RESOURCES ARE HELD BY EVERY NATION ON THE FACE OF THE EARTH. CHINA, A POOR NATION, CUBA, MEXICO, THEY ARE HELD BY EVERY COUNTRY, BUT WHAT MAKES US THE RICHEST NATION ON THE FACE OF THE EARTH? IT ISN'T BECAUSE OF THE ABUNDANCE OF NATURAL RESOURCES, CONTRARY TO WHAT PEOPLE THINK. IT IS BECAUSE OF THE OTHER TWO PARTS OF AN EQUASION, AN EQUASION WHICH SAYS THAT MAN'S MATERIAL WELFARE, IN OTHER WORDS THE LIFESTYLE THAT YOU LEAD, THE FACT YOU HAVE GOOD CLOTHING ON INSTEAD OF ANIMAL SKINS AND THE FACT YOU CAME HERE IN AN AUTOMOBILE MADE WITH STEEL, THE FACT YOU LIVE IN A HOME WHERE YOU KNOW YOU ARE GOING TO BE WARM OR COOL DEPENDING ON THE ENVIRONMENT.

22

THOSE THINGS ARE A PRODUCT OF MAN'S MATERIAL WELFARE, YOUR WELFARE WITH NATURAL RESOURCES WHICH WERE PUT THERE BY GOD AND HUMAN EFFORT WHICH IS EACH AND EVERYONE OF US MULTIPLIED BY THE TOOLS THAT ARE UTILIZED.

THE REASON I BROUGHT THE FIRST ISSUE UP IS THE WAY THE SYSTEM IS SET UP IN AMERICA HERE THAT WE TAKE NATURAL RESOURCES AND DO SOMETHING WITH IT WHICH IS WHAT HAS MADE THE STANDARD OF LIVING THAT WE HAVE IS BY A SYSTEM OF MINING LAWS OR WHEREBY THE PERSON WHO RISKS AND GOES INTO THE WILDERNESS, SO TO SPEAK, AND FINDS A MINERAL HAS GOT TO HAVE SOME REASON TO TREAT IT AS HIS OWN. IT IS NOT A RENTED PIECE OF GROUND. IT IS IN A SENSE HIS OWN.

THE MINING LAWS ARE IN FACT SET UP SO THAT WHEN WE FILE A MINING CLAIM THAT IS THE FIRST STEP IN THE PROCESS OF US ACQUIRING IT FOR OURSELVES.

YOU WILL FIND IN MANY CASES MINERS, SUCH AS MYSELF, I'M A MINER. I OWN THE LIBERTY MINE AND THE LIBERTY BELL MINE. WE SHEPHERD THE LAND MANY TIMES BETTER THAN THE PUBLIC. THEY KNOW THAT AT THE BLM BECAUSE I COMPLAIN ABOUT PEOPLE THROWING BEER CANS AND TRASH AND EVERYTHING ELSE THAT GOES ON.

THE NECESSITY FOR THIS IS THAT SOMEONE LIKE ME WHO GOES OUT THERE AND TREATS THAT LAND, SHEPHERDS IT, HUSBANDS IT VERY WELL, OKAY, EXPECTS A RETURN, OTHERWISE THERE IS NO NEED TO GO OUT THERE AND LIVE IN THE DESERT AND

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23

PUT UP WITH VERY LITTLE AND TRY TO BUILD SOMETHING AND ACHIEVE FROM BARE GROUND WHICH WAS NOTHING BUT GRAVEL TO EVERYONE ELSE.

THERE WAS SOME FIGURES GIVEN BY DOCTOR BIRDICK EARLIER ABOUT GOLDFIELDS. I HAVE HAD SOME DOCUMENTATION HERE. THERE IS A STUDY PUT OUT BY THE METALS ECONOMIC GROUP WHICH I HAVE DATA RIGHT HERE IF ANYBODY WANTS TO LOOK AT IT LATER.

THIS STUDY IS A $4800 STUDY, SO IT'S WELL RECOGNIZED AS BEING A VERY HIGH CLASS AND VERY DOCUMENTED AUTHORITATIVE STUDY AND FROM THIS STUDY AND OTHER SOURCES, THE FIGURES ARE FAR HIGHER THAN THAT IN ACTUALITY.

BILL MAY WANT TO CORRECT ME OR HE MAY RATHER NOT COMMENT FOR GOLDFIELDS.

IN ACTUALITY, THOUGH, THE INDUSTRY BELIEF IS THAT GOLDFIELDS HAS APPROXIMATELY A HUNDRED MILLION DOLLARS IN INVESTMENT AND APPROXIMATELY 120,000 ACRES OF MINING CLAIMS. NOW MANY PEOPLE COULD SAY, WELL, THAT MAY SOUND LIKE ONE HECK OF A LAND GRANT, BUT LET'S STOP AND THINK WHAT THEY HAVE DONE.

THEY HAVE TAKEN THE BARE DESERT, WHICH MEANS NOTHING TO ANYONE ELSE AND WHICH FOR 400 YEARS THAT MEN HAVE KNOWN ABOUT MINING ON THAT AREA AND 100 YEARS THAT THE AMERICAN PEOPLE HAVE KNOWN ABOUT THE MINING, THEN TAKING THAT BARE DESERT AND THEY ARE CONVERTING IT INTO JOBS WHICH

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24

GENERATE HOMES FOR YOU, GENERATING EMPLOYMENT, GENERATING VEHICLES.

THEY HAVE TAKEN NOTHING MORE THAN BASICALLY GRAVEL AND ROCKS WHICH MOST COMPANIES SAY ARE NONPRODUCTIVE AND IT WILL PRODUCE EMPLOYMENT FOR PROBABLY THE NEXT CENTURY. I BELIEVE THE STARTING FIGURES ARE AT AROUND 500 PEOPLE AND IT WILL GO UP TO NOBODY CAN TELL FOR SURE.

THE ACTUAL DOLLARS, THOUGH, SPENT IN EXPLORATION ALONE BY THIS FALL WHEN THEY BEGIN PRODUCTION WILL BE SOMEWHERE AROUND ONE HUNDRED MILLION DOLLARS OF WHICH THAT IS A TREMENDOUS INPUT INTO THE LOCAL ECONOMY. WHAT THAT WILL PRODUCE OVER THE NEXT 100 YEARS, FAMILIES, CHILDREN, CHILDREN GOING TO COLLEGE, VEHICLES, HOMES. THAT WILL BE A TREMENDOUS BENEFIT NOT JUST TO AMERICA AND NOT JUST TO THESE COUNTIES, IMPERIAL AND YUMA COUNTY, AND NOT JUST TO THIS CITY, BUT IT WILL BE A BENEFIT ON EACH AND EVERY ONE OF YOU IN VARIOUS WAYS BECAUSE THAT HELPS MAINTAIN A STANDARD OF LIVING WHICH I AM SURE YOU ARE ALL COMFORTABLE WITH.

I SEE NO ONE HERE IN BEAR SKINS. I'M SURE ALL OF YOU CAME HERE IN VEHICLES AND ALL THESE THINGS ARE PRODUCTS OF MINERS.

I AM PERSONALLY CONCERNED BECAUSE EVEN THOUGH THEY ARE NOT TAKING ANY OF MY LAND, WHAT WE ARE SITTING

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25

TODAY, EVEN THOUGH THE BLM PUT IT IN THEIR RECORDS AS HAVING NO CONSEQUENCE, IN FACT FROM THE GOVERNMENT'S OWN RECORDS IT HAS VALUES, PROVEN PRODUCTION FROM IT 38 TIMES THE VOLUME THAT WAS PROVEN THAN THE PRODUCTION FROM MESQUITE AND THEY ARE TAKING A PIECE OF MY NEIGHBOR'S GROUND, IN ESSENCE THEY ARE TAKING OTHER PEOPLE'S GROUND UP HERE. THEY ARE GOING AFTER THE MUGGINS.

AS I SAY, IT DOESN'T AFFECT ME, BUT THEN IT GOES BACK TO JUST LIKE THE JEWS IN NAZI GERMANY. I WOULD RATHER OBJECT WHEN THEY ARE GETTING MY NEIGHBOR AS WHEN THEY ARE COMING TO GET ME. WITHOUT THESE LANDS BEING AN OPEN INVENTORY WHERE ANY CITIZEN CAN TAKE IT UPON THEMSELVES TO TRY TO CREATE A LIFE, TRY AND BUILD SOMETHING FOR THEIR FAMILY, AND IT ALSO FALLS OUT FOR EVERYONE ELSE WITHOUT THAT LAND BEING AVAILABLE TO US, THE MINERAL FINDS WILL NOT BE MADE.

IN FACT, GOLDFIELDS DIDN'T MAKE THE FIND. NO BIG COMPANY MAKES THE FIND. IT'S SOME LITTLE RAGGEDY PROSPECTOR OUT IN THE WOODS, A MISFIT ACCORDING TO SOCIETY'S VIEW AS WHO LOOKS FOR SOME WAY TO GET OUT AND GET AWAY AND DO THEIR OWN THING. WE GO OUT THERE AND CREATE A LIFE FOR OURSELVES.

IF WE ARE SERIOUS WE SHEPHERD AND HUSBAND THE LAND BETTER THAN THE PUBLIC DOES. IF WE ARE SUCCESSFUL, WHICH IS A VERY SMALL PER CENT OF THE TIME, WE

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BUILD SOMETHING WHICH ULTIMATELY WAS SOLD TO GOLDFIELDS. THAT'S WHERE THE MINING ORES COME IN. THAT'S WHERE WE ARE AT TODAY.

I AM HAVING MAJOR CORPORATIONS GIVING ME OFFERS ON MY OWN LAND NOW. I ADMIT IT TOOK FOUR YEARS OF FIGHTING EVERYBODY FROM RIVAL CLAIMANTS TO BLM TO YOU NAME IT IN ORDER TO ACHIEVE THAT.

THAT LAND MUST BE IN THE INVENTORY FOR ANYONE TO GO TO TO TRY AND DEVELOP FOR THIS TO HAPPEN, OTHERWISE IT WILL SIT OUT THERE AND A FEW PEOPLE WHO HAVE GOT A RETIREMENT CHECK OR A LOT OF MONEY CAN GO OUT IN IT AND LOOK AT IT ONCE IN A WHILE AND AVERAGE PEOPLE WILL GO OUT AND DRINK THEIR BEER ON IT AND BREAK THEIR BEER CANS AND MESS IT ALL UP. IT WILL NOT BE SHEPHERDED LIKE THE RENTAL CAR IS NOT SHEPHERDED AND IT WILL NEVER BE DEVELOPED AND ULTIMATELY SHUT OFF ENOUGH OF THESE VARIOUS AREAS LIKE THIS TO WHERE YOU KILL MINING AND YOU ARE GOING TO HURT YOUR INDUSTRIAL BASE WHICH IS GOING TO HURT AMERICA AS A NATION.

WE HAVE WHAT WE HAVE NOT BECAUSE GOD GAVE US MORE IN TERMS OF NATURAL RESOURCES AND NOT BECAUSE HE GAVE US MORE IN TERMS OF HUMAN ENERGY EITHER, BECAUSE YOU SEE IN AMERICA WE DON'T WORK NEARLY AS HARD AS CHINESE OR MANY OTHER PEOPLES. WE HAVE WHAT WE HAVE BECAUSE OF THE KEY INGREDIENT IN THIS FORMULA.

MAN'S MATERIAL WELFARE IS A PRODUCT OF

THE NATURAL RESOURCES PLUS HUMAN ENERGY, ALL COUNTRIES HAVE BOTH, MULTIPLIED BY THE TOOLS. THE TOOL IS THE KEY THING. MULTIPLY THOSE OTHER TWO THINGS BY THE TOOLS.

IN AMERICA IT ISN'T JUST THE PEOPLE LIKE THE GOLDFIELDS WITH THEIR BIG EQUIPMENT AND SO FORTH THAT IS THE TOOL. IT IS THE FACT WE HAVE A SYSTEM WHICH ENABLES SOMEONE TO DREAM AND GO IN THE WOODS AND TRY AND BUILD AND MAKE A DISCOVERY AND EVENTUALLY OVER A PERIOD OF TIME DEVELOP IT TO THE POINT THAT THE MAJORS THEN TAKE IT. ONCE WE ARE CONVINCED WE FINALLY CAN CONVINCE THEM IN SOME CASES AND THEN THAT BUILDS SOMETHING THAT FALLS OUT A BENEFIT FOR EACH AND EVERYONE OF YOU AND YOUR CHILDREN AND YOUR GRANDCHILDREN.

1 I GUESS THAT'S PROBABLY ABOUT ALL. NO, ONE OTHER THING. WHAT I SAY IN TERMS HERE, I AM NOT JUST SAYING THERE'S GOLD. I COULD SHOW YOU A GOLD -- I COULD SHOW YOU A FEW PICTURES HERE. WE HAVE TAKEN NUGGETS AS BIG AS A THUMB OFF MY MINING CLAIMS. WE HAVE VALUES OFF THOSE CLAIMS SUCH THAT WE BELIEVE ON OUR AREAS ALONE IT CAN GENERATE EMPLOYMENT FOR 500 PEOPLE FOR THE NEXT HUNDRED YEARS JUST ON CLAIMS I HOLD.

NOW THAT MAY SOUND CRAZY, BUT YOU CAN LOOK AT WHAT GOLDFIELD HAS. THEY ARE NOT FOOLS. GOLDFIELDS AND BRITISH PETROLEUM AND NEWMAR HAVE HOLDINGS THAT COMPRISE IN EXCESS OF 200 SQUARE MILES DIRECTLY ACROSS THE RIVER FROM ME. I CAN ALMOST THROW A STONE FROM MINE TO THEIRS.

THEY HAVE SPENT, IN THIS YEAR IT WILL BE IN EXCESS OF A HUNDRED MILLION DOLLARS. THEY DIDN'T DO THAT TO TRY TO GENERATE LOCAL ECONOMY. THEY DID THAT BECAUSE WHAT THEY BELIEVE THE FUTURE POTENTIAL WAS. THAT STRUCTURE THEY ARE ON COMES RIGHT ACROSS THE RIVER.

GOVERNMENT STUDIES PROVE THIS IS THE SAME STRUCTURE THAT THEY'RE ON IS THE SAME STRUCTURE THAT

1 I HAVE. THAT'S THE U.S.G.S. STUDY.

THAT BEING THE CASE, IT'S FOOLISH, OR LET'S SAY, IT IS SHORTSIGHTED AND INEPT FOR THERE NOT TO BE INCLUDED IN DATA THE FACT THAT POTENTIAL FOR AS MUCH AS POSSIBLY, OR CERTAINLY SOMETHING EXISTS ON MY SIDE, ON OUR SIDE OF THE RIVER, ON THE ARIZONA SIDE, AS WHAT EXISTS ON THE OTHER SIDE.

AM I PASSED THE LIMIT?

MR. MCCLURE: ONE MINUTE.

MR. CAMPBELL: THIS INFORMATION HAS BEEN KEPT QUIET AS MUCH AS POSSIBLE BY THE MAJOR MINING COMPANIES WHICH IT IS TO THEIR INTEREST TOO. THEY DON'T WANT IT OUT BECAUSE THE PRICE OF LAND GOES UP AND MORE COMPANIES COME IN AND SO FORTH AND I UNDERSTAND THAT, BUT NEVERTHELESS IT IS TIME THAT WE ALL HANG TOGETHER ON THIS THING BECAUSE IT GOES BACK TO WHAT BEN FRANKLIN SAID. HE SAID, "BOYS, WE HAD BEST ALL HANG TOGETHER ON THIS BECAUSE IF WE DON'T, IT'S MOST ASSURED WE WILL ALL BE HUNG SEPARATELY."

THIS IS IN EACH AND EVERYONE OF YOURS INTERESTS TO PRESERVE THE TOOL WHICH THE MINING LAW AND THE INVENTORY OF LAND IS AN ESSENTIAL PART OF THAT TOOL.

MR. MCCLURE: THANK YOU, MR. CAMPBELL.

MR. CAMPBELL: THANK YOU, SIR.

MR. MCCLURE: LES BUNDE.

C4 MR. BUNDE: MR. MCCLURE, I AM LES BUNDE. I HAVE BEEN A TAXPAYER IN ARIZONA SINCE 1943, AND WE ALL GO ALONG WITH THE BLM PLANNING AND SUGGEST MULTIPLE PURPOSE USE OF THE LAND. THANK YOU VERY MUCH.

MR. MCCLURE: THANK YOU. W.L. WOOLEY.

C5 MR. WOOLEY: HI, FOLKS. I CAME TO YUMA IN '29, AND I CAN TELL YOU STORIES --

MR. MCCLURE: EXCUSE ME. COULD YOU STATE YOUR NAME, PLEASE?

MR. WOOLEY: I AM WALTER WOOLEY. AND I CAN -- HAVE TALKED WITH PROSPECTORS, IT WAS YEARS AHEAD OF ME. AND I THINK THAT WHENEVER YOU LET, TAKE AWAY THE RIGHT OF THE PUBLIC TO DEVELOP PUBLIC LANDS, YOU ARE DETERIORATING THE ADVANCEMENT OF OUR AMERICA.

WE SHOULD KEEP THIS LAND FROM MULTIPLE USES AND LET THE PEOPLE DEVELOP IT. WHAT MINERALS WE HAVE HAS STARTED FROM THE MAN WHO DIDN'T HAVE NOTHING AND THE MAN WHO DID GET A HOLD OF IT AND DID DEVELOP IT IS WHAT MADE AMERICA WHAT IT IS TODAY. I THINK IT SHOULD BE LEFT MULTIPLE

C6

C7

30

PURPOSE USE OF THE LAND. THANK YOU.

MR. MCCLURE: THANK YOU. JOHN ROWE.

MR. ROWE: I HAVE NOTHING TO SAY AT THIS TIME.

MR. MCCLURE: NEVA ROWE.

MRS. ROWE: NOTHING.

MR. MCCLURE: I BELIEVE THIS IS PAUL KUBINSKI, IS THAT CORRECT?

MR. KUBINSKI: YES, MY NAME IS PAUL KUBINSKI. I AM OPPOSED TO THE PLAN OF CHANGING ANYTHING FROM THE WAY IT IS. I BELIEVE THERE IS ENOUGH RULES AND REGULATIONS GOVERNING THE LAND AND PROTECTING THE LAND AND THE ENVIRONMENT TO TRY AND GO AHEAD AND CHANGE ANYTHING.

THE FEDERAL GOVERNMENT HAS GOT MILES OF ACRES WHERE THEY DON'T HAVE THE PROPER MANPOWER TO ENFORCE THE RULES AND REGULATIONS THAT ARE ALREADY IN EXISTENCE. THEY CAN'T ENFORCE THINGS THAT HAPPEN IN THE WILDERNESS AREA TO BEGIN WITH. WHY PUT MORE AREA INTO THIS WILDERNESS WHERE YOU CAN'T GO AND ENJOY THE LAND AS A MULTIPLE USE LAND?

THE LAND SHOULD BE OPENED TO EVERYBODY FOR MINING, FOR ENJOYMENT, FOR CAMPING. I'M JUST TOTALLY AGAINST THE ENTIRE PLAN. THAT'S ALL I HAVE TO SAY.

MR. MCCLURE: THANK YOU. DEAN HAUGHTELIN.

MR. HAUGHTELIN: THAT'S PRETTY CLOSE.

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31

MY NAME IS DEAN HAUGHTELIN. ONE DISTINCTION I HAVE ANYWAY, SO FAR I AM THE OLDEST ONE HERE. I CAME HERE IN 1924. I WAS BORN HERE AND MY FIRST RECREATION AREA WAS THIS DESERT BEFORE I COULD WALK. I WAS PROBABLY OUT THERE WITH MY FATHER. WE LOVED IT AND ALWAYS TOOK CARE OF IT.

AS THE OTHER GENTLEMAN SPOKE OF THE BEER BOTTLES AND SUCH THAT IS OUT THERE, THIS IS VANDALISM AND IT HAPPENS RIGHT IN OUR CITY. WE CAN'T MAKE LAWS THAT ARE GOING TO STOP IT. IT IS GOING TO HAPPEN.

I HAVE TO GO ALONG WITH SOME OF THEIR PLANS. I NOTICE THAT MINING WASN'T EVEN ADDRESSED TOO MUCH IN ANY OF THEIR PLANS OTHER THAN THIS STATEMENT THEY GOING TO HAVE MULTIPLE USE.

I THINK MINING IS VERY IMPORTANT. I DO A LITTLE PROSPECTING JUST FOR THE RECREATION OF IT, DON'T PLAN ON GETTING RICH AT IT ALL. WHEN I RETIRE I MAY BE A LITTLE MORE SERIOUS ABOUT IT, BUT STILL IT'S RECREATION AND I SEE NO REASON WHY WE CAN'T DO THIS.

WE DON'T DESTROY THE DESERT. WE SHEPHERD IT AS THE GENTLEMAN SAID. IT'S A GOOD WORD FOR IT. THE WILDERNESS TO ME IN THE DESERT, WELL, IT HARDLY EXISTS TO SAY A WILDERNESS AREA. IT IS GOING TO BE USED BY VERY, VERY FEW, THE AFFLUENT PEOPLE, SOMEBODY WHO CAN MAYBE HIRE HORSES AND MULES AND CAN GO INTO A WILDERNESS AREA. THAT'S THE ONLY WAY IT SUPPOSEDLY CAN BE USED.

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C8

32

IT CAN'T BE DRIVEN INTO. THE DESERT, OBVIOUSLY YOU DON'T BACK PACK INTO VERY MUCH OR FOR VERY LONG WHEN YOU PACK WATER ON YOUR BACK AT EIGHT POUNDS PER GALLON AND THE DESERT REQUIRES GREAT VOLUMES OF WATER. IF YOU CAN STAY ON IT, LET'S SAY, EVEN OVER NIGHT, EVEN A 48 HOUR STAY, IT TAKES WATER. YOU ARE NOT GOING TO DO VERY MUCH. IT'S NOT GOING TO BE USED AS A WILDERNESS AREA. IT'S JUST GOING TO SIT THERE AND NOBODY WILL USE IT. IT WILL JUST SIT THERE.

ANY OTHER KIND OF USE, THE TEARING UP OF IT BY OFFROADERS THAT MISBEHAVE AND SUCH, IT'S STILL VANDALISM. IT'S GOING TO EXIST NO MATTER WHAT. WE CAN'T STOP IT, SO THERE'S NO REASON FOR MAKING MORE LAWS THAT ARE GOING TO BE DIFFICULT TO ENFORCE, EXPENSIVE TO ENFORCE, AND IT JUST BARS THE OTHER PEOPLE FROM GETTING IN THERE AND USING THE LAND. THANK YOU.

MR. MCCLURE: THANK YOU. BRADLEY BAIRD.

MAJOR BAIRD: I AM MAJOR BAIRD FROM THE MARINE CORPS AIR STATION. HAS THE BUREAU RECEIVED THE AIR STATION'S LETTER DATED 25 FEBRUARY IN RESPONSE TO YOUR EIS?

MR. MCCLURE: I'M NOT CERTAIN OF THAT.

MAJOR BAIRD: SIR, LET ME GIVE YOU A COPY OF THAT.

MR. MCCLURE: THANK YOU.

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C9

33

MAJOR BAIRD: I WOULD JUST LIKE TO STRESS THAT IN OTHER OF YOUR IMPACT STATEMENTS IT ADDRESSES MILITARY OVERFLIGHTS IN WILDERNESS AREAS. THE MILITARY OVERFLIGHTS CONCERNING THE LOW LEVEL TRAINING ROUTES ARE A VERY IMPORTANT PART OF OUR ENTIRE TRAINING AND READINESS SOLIS.

OUR CONCERN IS THAT NO DEGRADATION TO TRAINING NOR RESTRICTION TO FLYING ACTIVITY OVER THESE WILDERNESS AREAS BE ENCOUNTERED. THANK YOU.

MR. MCCLURE: THANK YOU. THIS WILL BE MADE PART OF THE RECORD. I'M GOING TO HAVE TO TRY AGAIN HERE. LESLIE KUMLER, IS THAT CORRECT?

MR. KUMLER: I APPRECIATE THE PRIVILEGE AS LESLIE KUMLER FROM YUMA, ARIZONA. I HAVE SPENT A GOOD BIT OF TIME IN THE MOUNTAINS IN AND AROUND YUMA IN THE PAST SEVEN YEARS AND I HAVE BEEN VISITING SINCE '57. I WOULD LIKE TO TAKE THIS TIME TO THANK THE BLM FOR THEIR GREAT INTEREST AND I WOULD LIKE TO CARRY ON WITH THE HONORABLE UDALL AND THE HONORABLE MR. GOLDWATER.

MULTIPLE USAGE IS ONE OF THE THINGS THAT I HAVE LEARNED IN MY 20 YEARS OF PRACTICING SOIL CONSERVATION AND I FEEL THAT SINCE WE HAVE A CHANCE TO KEEP THE HERITAGE OF OUR NATURAL RESOURCE, KEEP IT FREE TO CITIZENS WHO DO GROW OLDER AS THE HAIR SAYS, AND ALLOW US TO USE THE TECHNOLOGY THAT HAS BEEN COMING FORWARD IN THIS TECHNICAL TIME FOR THE USE OF MINERALS, ESPECIALLY IN THIS UNHIGHLY POPULATED AREA

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34

OF ARIZONA.

TO MY KNOWLEDGE THERE IS PERHAPS 20 PER CENT OF ARIZONA IN HEAVY POPULATION AREAS. THERE REMAINS A GOODLY PER CENT OF ARIZONA FOR A LOT OF DIFFERENT USES. AND I FEEL LIKE THAT SINCE WE ARE TAX PAYERS THE LEAST WE CAN DO IS TO PUT OUR PREFERENCE TO WHAT WE THINK MIGHT HAPPEN WITH THE PROPER USE OF THE NEW TECHNOLOGY FIELDS THAT ARE COMING FORWARD, AND ESPECIALLY IMPROVED MINING TO WHERE IT WILL BE ACCEPTED AS RECREATION AND NOT BE EXCLUDED FROM RECREATION.

MR. MCCLURE: THANK YOU, MR. KUMLER. OWEN LONDBERG.

C10

MR. LONDBERG: MY NAME IS OWEN LONDBERG. I BEING A TAX PAYER, I AGREE WITH THE BLM'S RECOMMENDATION FOR THOSE AREAS UNSUITABLE FOR WILDERNESS. I BELIEVE WE ARE ALL BETTER SERVED UNDER MULTIPLE USE MANAGEMENT. THANK YOU.

MR. MCCLURE: THANK YOU. BOB FOLLOWWILL.

C11

MR. SMITH: I WILL GIVE YOU THIS LETTER AND FOR THE AIR I AM DON SMITH. I DID NOT SEE A SPACE FOR ME TO SPEAK, BUT WE ARE BOTH WITH MOUNTAIN BELL. CAN WE MAKE A JOINT STATEMENT OR MAKE IT SEPARATELY?

MR. MCCLURE: YOU MAY PROCEED TOGETHER IF YOU WISH.

MR. SMITH: MY NAME IS DON SMITH. I

35

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AM WITH MOUNTAIN BELL TELEPHONE COMPANY. WE WOULD LIKE TO TALK ABOUT A PARTICULAR AREA, MOHAWK PASS. MOHAWK PASS IN THE NEW LAND MANAGEMENT RESOURCE AREA HERE IS NOT DEFINED AS A COMMUNICATIONS SITE AREA. WE ARE VERY CONCERNED ABOUT THIS AND ABOUT THIS GETTING CHANGED FOR A COMMUNICATIONS SITE CORRIDOR.

THIS IS NOT A UTILITY CORRIDOR, THIS IS FOR LIKE A MICROWAVE OR RADIO REPEATER SITE. THE AREA WE ARE PARTICULARLY CONCERNED ABOUT IN THE MOHAWK PASS IS APPROXIMATELY 660 FEET IN WIDTH AND ABOUT AN EIGHTH OF A MILE LONG.

IT IS CURRENTLY ENCUMBERED BY AN EXISTING SITE, A MICROWAVE SITE AND ABANDONED MICROWAVE SITE, THREE UTILITY LINES, A GORGE CUT THROUGH THE AREA BY THE RAILROAD, THE OLD EXISTING HIGHWAY, AND A PORTION OF IT IS BEING USED BY THE HIGHWAY DEPARTMENT TO DUMP BLASTING THINGS FROM THE ROCK FROM THE OTHER AREAS AROUND WHERE THEY BLAST THROUGH THE HILLSIDE OR MAKING ROADBEDS.

SO WE ARE VERY CONCERNED ABOUT THIS AREA AND WE WOULD LIKE TO MAKE OUR FORMAL PRESENTATION AND OUR COMMENTS TO THAT PARTICULAR AREA BE CHANGED TO A COMMUNICATIONS SITE.

I HAVE ANOTHER MEMBER HERE WITH ME FROM MOUNTAIN BELL, BOB FOLLOWWILL. I WOULD LIKE HIM TO GO AHEAD AND FURTHER EXPLAIN ABOUT COMMUNICATIONS SITES AND ANOTHER

36

REASON WHY WE WANT THIS CHANGED FROM THE CORRIDOR TO A COMMUNICATIONS SITE AREA. THANK YOU.

C12

MR. FOLLOWWILL: MY NAME IS BOB FOLLOWWILL AND I REPRESENT MOUNTAIN BELL. THE PARTICULAR SITE THAT WE ARE INTERESTED IN IS AT THE SOUTHEAST END OF UTILITY CORRIDOR 11.

WE HAVE A DESIGNATED COMMUNICATIONS SITE AT TELEGRAPH PEAK OUTSIDE OF THE YUMA MANAGEMENT AREA. THERE ARE A NUMBER OF OTHER SITES THAT ARE DESIGNATED UTILITY OR COMMUNICATIONS SITES. THEY ARE ALL PART OF A RADIO ROUTE FROM PHOENIX TO YUMA.

THIS RADIO ROUTE IS UTILIZED NOT ONLY BY MOUNTAIN BELL, BUT ALL LONG DISTANCE CARRIERS WHO CARRY TRAFFIC FROM YUMA TO PHOENIX AND ONTO THE REST OF THE WORLD. THE ROUTE THAT WE ARE TALKING ABOUT SERVES THE MILITARY, THE MARINE CORPS AIR STATION, YUMA PROVING GROUND, THE CITY OF YUMA.

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ANY TRAFFIC THAT ORIGINATES IN YUMA IS TAKEN OVER THIS ROUTE TO PHOENIX AND OUT ONTO THE LONG DISTANCE NETWORK. WHAT WE ARE CONCERNED ABOUT IS THAT AS RECENT AS LAST YEAR THIS ROUTE IS NOW FULLY UTILIZED FROM THE STANDPOINT OF FREQUENCIES THAT CAN BE USED FOR MICROWAVE RADIO TRANSMISSION. IT IS UTILIZED NOT ONLY BY US, BUT BY OUR COMPETITORS.

YOU MIGHT LOOK AT IT FROM THE STANDPOIN

37

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THAT WE ARE IN THE PROBLEM TOGETHER. THE REASON THAT WE ARE ASKING THAT A SITE BE IDENTIFIED AS A COMMUNICATIONS SITE IS TO OPEN UP ADDITIONAL ROUTES THROUGH THERE WHEREBY WE HAVE ADDITIONAL FREQUENCIES AVAILABLE TO US SO THAT WE CAN CONTINUE TO SERVE AND PROVIDE COMMUNICATIONS SERVICE THAT WE HAVE ALL LEARNED WITH. THANK YOU.

MR. MCCLURE: THANK YOU BOTH FOR YOUR COMMENTS. JANEL SMITH.

C13

MS. SMITH: MY NAME IS JANEL SMITH. I AM THE PRESIDENT OF AMBA WHICH REPRESENTS PRECIOUS METALS INDUSTRY, INCLUDING THOSE INDEPENDENT MINING COMPANIES AND EXPLORATION AND DEVELOPMENT COMPANIES AND OIL GAS RESEARCH EXPLORATION OF ARIZONA. I AM ALSO THE STATE PRESIDENT OF THE ARIZONA SMALL MINERS ASSOCIATION WHICH WAS FOUNDED IN 1938, AND IS THE OLDEST MINING ORGANIZATION IN THE WEST.

FIRST OF ALL, IF I MAY, I WOULD LIKE TO COMPLIMENT MR. SNELL AND HIS PEOPLE. THIS IS THE THIRD HEARING I HAVE BEEN TO THIS WEEK AND I THINK YOU DESERVE COMMENDATION FOR YOUR PRESENTATIONS. IT IS THE FIRST TIME I HAVE SEEN THESE DONE SO WELL.

AS YOU KNOW, BOTH OF MY ORGANIZATIONS ARE MULTIPLE USE ORIENTED. WE WOULD LIKE TO COMMENT ON SOME SPECIFIC AREAS. WE AGREE WITH YOUR RECOMMENDATIONS ON THE AREAS RECOMMENDED UNSUITABLE, BUT PERHAPS FOR DIFFERENT REASONS.

THE CROSSMAN PEAK AREA HAS BEEN RECOMMENDED UNSUITABLE FOR WILDERNESS, BUT IT IS RECOMMENDED TO BE DESIGNATED AS A NATIONAL SCENIC AREA. BOTH THE U.S. GEOLOGICAL SURVEY AND THE U.S. BUREAU OF MINES IN THEIR MINERAL INVESTIGATIONS HAVE ADDRESSED THE MINERAL VALUES IN THIS AREA.

OUR INDEPENDENT SOURCES INDICATE THE POSSIBLITY OF THREE DIFFERENT TYPES OF DEPOSITS THROUGHOUT THIS WSA. THE FORMAL VEIN STRUCTURE, CONSISTING OF GOLD, COPPER, SOME MANGANESE, PLACER DEPOSITS ORIGINATING WITH THE VEIN GOLD AND WHAT APPEARS TO BE A LARGE DISSEMINATED GOLD DEPOSIT, PROBABLY OF SOLUTION ORIGIN AFTER VEIN STRUCTURES WERE FORMED.

IF THIS AREA PRODUCES THE TYPE OF MINING ACTIVITY THESE DEPOSITS INDICATE, THE ONLY SCENIC OPPORTUNITY WILL BE MINE TOURS; THEREFORE, WE RECOMMEND THAT THE AREA IS RELEASED WITHOUT RESTRICTIONS. GIBRALTAR MOUNTAIN HAS BEEN RECOMMENDED UNSUITABLE AND WE AGREE.

THERE ARE AT LEAST KNOWN DEPOSITS INSIDE THE WSA WHICH CONTAIN GOLD, COPPER, SILVER, AND HEMATITE, ONE PLACERVILLE DEPOSIT WITH MINOR PRODUCTIONS ALSO LOCATED WITHIN THE WSA.

THERE ARE TWO GOLD AND COPPER DEPOSITS JUST OUTSIDE WHICH HAVE HAD SIGNIFICANT PRODUCTION. THE CACTUS PLAIN AND EAST CACTUS PLAIN HAVE COPPER AND GOLD AND

SILVER OCCURRENCES JUST OUTSIDE THE BOUNDARY ON THE NORTHEAST AND BEAR OUT OCCURRENCES IN THE SOUTHERN PART OF THE WSA.

ALSO WITHIN THE BASIN THERE IS A THICK ACCUMULATION OF SEDIMENTS AND VOLCANICS WHICH MAY BE FAVORABLE FOR STRATA FORMING OR ENDING DEPOSITS. THE ARIZONA BUREAU OF GEOLOGY AND MINERAL TECHNOLOGY ON THE BASIS OF GEOLOGIC MANAGEMENT NEARBY FEEL THAT THE ROCK CHARACTERISTICS MAY BE SUCH THAT THERE IS A GOOD POSSIBLITY THAT BEDROCK COULD BE CLOSE TO THE SURFACE.

IN OTHER AREAS THIS HAS BEEN AN INDICATION OF MINERAL DEPOSITS. THE MUGGINS MOUNTAINS, WHICH ARE RECOMMENDED AS UNSUITABLE AND WITH WHICH WE AGREE CONSIST OF THE MUGGINS MINING DISTRICT. THE AREA CONTAINS GOLD, SILVER, COPPER, URANIUM AND COMMERCIAL BETONITE DEPOSITS. IT IS ALSO VERY POPULAR FOR OFFROAD VEHICLE USE.

THE SWANSEA WSA IS RECOMMENDED UNSUITABLE WITH WHICH WE AGREE. IT CONSISTS OF THE SANTA MARIA MINING DISTRICT WHICH HAS RECORDED PRODUCTION OF SILVER, MANGANESE, GOLD, COPPER, AND HEMATITE.

THE SANTA MARIA PLACER LINE IS IN THE SOUTH CENTRAL PART OF THE WSA. THE TRIGO MOUNTAINS AND TRIGO MOUNTAINS SOUTH CONSIST OF THE TRIGO, SILVER, AND EUREKA MINING DISTRICTS WHICH HAVE BEEN ACTIVE SINCE 1865.

THE TRIGO MOUNTAINS CONSISTING OF THE

TRIGO AND SILVER DISTRICTS HAVE RECORDED PRODUCTION OF MANGANESE, GOLD, AND SILVER. THE EUREKA DISTRICT AND TRIGO SOUTH CARRIES OUR ZINC AND MINOR COPPER AND IRON MINERALIZATION, DEEPLY OXIDIZED, AND COPPER, SILVER, AND GOLD MINERALIZATION IN FAULT FISSURE VEINS. ALL OF THE AFOREMENTIONED AREAS CARRY A POTENTIAL FOR MINERAL EXPLORATION AND DEVELOPMENT AND WE WOULD CERTAINLY RECOMMEND NOT ONLY THAT THEY ARE UNSUITABLE FOR WILDERNESS, BUT THAT OTHER RESTRICTIONS SHOULD NOT BE PUT ON THEM INHIBITING ANY KIND OF MINERAL EXPLORATION OR DEVELOPMENT.

KOFA UNITS THREE AND FOUR SHOULD NOT IN OUR ESTIMATION HAVE BEEN INVENTORIED. ONE OF THEM, KOFA UNIT THREE, CURRENTLY IS USED FOR RECREATIONAL ACTIVITIES AND RECREATIONAL PROSPECTING. NEITHER OF THEM MEET EIS CRITERIA.

IF IN FACT THE U.S. FISH AND WILDLIFE SERVICE WISHES TO WITHDRAW THESE AREAS, WE WOULD GO ON RECORD AS BEING OPPOSED SINCE WE FEEL THAT THE BUREAU OF LAND MANAGEMENT IS ALSO CAPABLE OF MANAGING BIG HORN SHEEP SINCE THE AMOUNT OF ACREAGE INVOLVED IN THESE PARCELS WOULD NO WAY GREATLY ENHANCE THE KOFA. WE FEEL ALL WOULD BE BEST SERVED BY THE BLM RETAINING THEM FOR USE UNDER MULTIPLE USE GUIDE LINES.

WE MAKE NO RECOMMENDATIONS ON THE WHIPPLE MOUNTAIN ADDITION RESORT, THE BIG MARIAS NORTH AND

SOUTH, LITTLE PICACHO PEAK ADDITION, DEAD MOUNTAIN NORTH AND SOUTH, OR CHEMEHUEVI AS OTHER THAN THAT WE BELIEVE THEY SHOULD BE RETURNED TO MULTIPLE USE MANAGEMENT SINCE IN MOST CASES THE REASON FOR INVENTORY HAS BEEN NEUTRALIZED.

MOST PEOPLE SPEND THEIR DAYS WITH NO THOUGHT OF THE ROLE MINING PLAYS IN THEIR LIVES. THEY SHOP TO BUY THE THINGS THEY WANT, BUT SELDOM CONSIDER THE ORIGINS. THE FOOD COMES FROM THE GROCERY STORE, ELECTRICITY FROM A WALL SOCKET, TOOLS FROM A HARDWARE STORE, CARS FROM A DEALER, APPLIANCES FROM A DEPARTMENT STORE, AND SO ON. IF WE DO THINK HOW THESE THINGS ARE CREATED, MOST OF US PROBABLY BEGIN WITH FARMS, FACTORIES, AND POWER STATIONS.

IN FACT, THEY ALL BEGIN WITH MINING. WITHOUT MINERALS WE COULD NOT TILL OUR SOIL, BUILD OUR MACHINES, SUPPLY OUR ENERGY, TRANSPORT OUR GOODS, OR MAINTAIN ANY SOCIETY BEYOND THE MOST PRIMITIVE. OUR HORN OF PLENTY STARTS WITH A HOLE IN THE GROUND. WE ARE IN TROUBLE IF WE FORGET THAT.

MINERALS ARE OUR KEYSTONES OF DESTINY. AS POPULATION INCREASES, TECHNOLOGY ADVANCES AND THE STANDARD OF LIVING CONTINUES TO CLIMB, DEMAND FOR THE EARTH'S RESOURCES WILL CONTINUE TO GROW.

IT IS NECESSARY TO PRODUCE 45,000 POUNDS OF NEW MINERALS EACH YEAR FOR EACH AMERICAN AND TO GENERATE ENERGY EQUAL TO HAVING 300 PEOPLE WORKING AROUND THE

42

CLOCK FOR EACH OF YOU. THOSE OF US IN THIS INDUSTRY HAVE ALWAYS BEEN PROUD TO BE SUCH AN IMPORTANT PART OF YOUR DAILY LIVES AND WE FELT A SENSE OF GRATITUDE, ACCOMPLISHMENT, AND EVEN WONDER THAT THIS COUNTRY CANNOT EXIST WITHOUT WHAT WE PRODUCE DAILY.

WE HAVE ALWAYS FELT IT IMPORTANT TO KEEP UP OUR SEARCH FOR NEW MINERAL DEPOSITS, TO DEVELOP OUR TECHNOLOGY, TO SEE BELOW THE EARTH'S SURFACE. IF OUR TECHNOLOGY AND EXPLORATION METHODS HAVE PROGRESSED IN THE LAST TEN YEARS TO A HIGH DEGREE OF EFFICIENCY, THE AREAS WE IGNORED THEN WITH OUR ADVANCED TECHNOLOGY NOW SHOW POSSIBILITIES OF COMMERCIAL DEPOSITS OF STRATEGIC MINERALS.

WE TOO WISH IT WOULD BE POSSIBLE TO MINE IN CONVENIENT AREAS. THINK HOW MUCH SIMPLER IT WOULD BE FOR ALL OF US. UNFORTUNATELY MINERALS ARE WHERE YOU FIND THEM, NOT WHERE YOU WOULD LIKE THEM TO BE.

IT IS OUR RESPONSIBILITY TO SEE THAT THIS NATION HAS A CONTINUING SUPPLY OF THOSE MINERALS NECESSARY FOR OUR CITIZENS' DAILY LIVES AND THE DEFENSE OF OUR NATION. WE FEEL THAT THE BUREAU OF LAND MANAGEMENT WILL CONTINUE TO DO WHAT THEY DO BEST, TO MANAGE THE PUBLIC LAND FOR ALL ITS CITIZENS. YOU AT THE BLM HAVE ALREADY PROVED YOU ARE INDEED MASTERS OF MULTIPLE USE MANAGEMENT. WE ONLY ASK THAT YOU CONTINUE TO DO THIS. THANK YOU.

MR. MCCLURE: THANK YOU, MS. SMITH.

C14

43

ANY OTHERS SIGNED UP TO SPEAK? ALLAN, DID YOU WISH TO SPEAK?

MR. BELT: NO, I WAS GOING TO MOVE THE PODIUM.

MR. MCCLURE: KATHRYN MICHEL.

MS. MICHEL: MY NAME IS KATHRYN MICHEL. I AM FROM SOMERTON AND I AM REPLACING CARRIE MEISTER, REPRESENTING THE YUMA AUDUBON SOCIETY.

THIS STATEMENT WAS PREPARED BY THE CONSERVATION COMMITTEE OF THE YUMA AUDUBON SOCIETY AND CARRIE HAD INTENDED TO READ IT. WE APPRECIATE THE LONG HOURS THAT THE YUMA DISTRICT STAFF HAS PUT INTO RESEARCHING AND WRITING THIS DRAFT OF THE RESEARCH MANAGEMENT PLAN AND HAVE FOUND MUCH VALUABLE INFORMATION IN IT. WE WANT TO WORK WITH THE BLM IN ORDER TO PRODUCE A FINAL VERSION WHICH WILL STRONGLY PROTECT THE NATURAL RESOURCES OF THE YUMA DISTRICT WHILE ALLOWING FOR AN ORDERLY DEVELOPMENT.

THE DRAFT PLAN NEEDS TO BE STRENGTHENED IN SEVERAL WAYS IN ORDER TO ADEQUATELY PROTECT THE ENVIRONMENT FROM ADVERSE IMPACT. THE NUMBER OF WILDERNESS AND SPECIAL MANAGEMENT AREAS, ESPECIALLY AREAS OF CRITICAL ENVIRONMENTAL CONCERN, NEED TO BE INCREASED IN ORDER TO RECOGNIZE THE UNIQUE PLANT AND ANIMAL COMMUNITIES AND THE CULTURAL RESOURCES OF THE YUMA DISTRICT. THE YUMA AUDUBON WILL ADDRESS SPECIFIC WILDERNESS STUDY AREAS AND SPECIAL MANAGEMENT AREAS IN WRITTEN COMMENTS WHICH WILL BE SUBMITTED

44

BY THE APRIL 19 DEADLINE.

TONIGHT WE WILL JUST POINT OUT THAT THE PLAN SHOWS MORE CONCERN FOR THE NUMBER OF WILDERNESS AREAS WITHIN THE 250 MILES OF PHOENIX AND LAS VEGAS AREAS THAN WHETHER PEOPLE IN YUMA HAVE TO DRIVE 250 MILES TO GET INTO A WILDERNESS AREA. WE NEED WILDERNESS CLOSE TO THE POPULATION CENTERS OF THE LOWER COLORADO RIVER, INCLUDING YUMA, BLYTHE, PARKER, LAKE HAVASU CITY, AND NEEDLES, AND BULLHEAD CITY IN ORDER TO PROVIDE A FULL RANGE OF RECREATIONAL OPPORTUNITY.

THE YUMA AUDUBON IS FAMILIAR WITH THE SEVEN WILDERNESS ENVIRONMENTAL IMPACT STATEMENTS FOR ARIZONA AND CALIFORNIA DESERT CONSERVATION AREAS. OF THESE SEVEN, ONLY THE ARIZONA STRIP AND RECENT PHOENIX AREA WILDERNESS PROPOSED ACTIONS RECOMMENDED A SMALLER PERCENTAGE OF THE WSA ACRES THAN THE YUMA DISTRICT AND THE ARIZONA STRIP PROPOSAL GREW TO INCLUDE MUCH MORE WILDERNESS IN THE ARIZONA WILDERNESS BILL PASSED DURING THE LAST CONGRESS.

1 WE FEEL THAT THE FINAL RPM SHOULD GIVE MORE CONCERN TO SPECIAL STATUS SPECIES OF ANIMALS AND PLANTS. WE AGREE THAT RIPARIAN HABITAT NEEDS TO RECEIVE PRIORITY PROTECTION BECAUSE THERE IS SO LITTLE OF IT LEFT ALONG THE COLORADO RIVER. WE ALSO FEEL THAT THE PLAN SHOULD GIVE MORE ATTENTION TO THE FEDERAL AND ESPECIALLY LISTED ENDANGERED, THREATENED, AND RARE SPECIES. AGAIN WE WILL MENTION SPECIFIC SPECIES IN OUR WRITTEN COMMENTS.

45

2 WE FEEL THAT THE CLAPPERRAIL, FOR EXAMPLE, SHOULD BE GIVEN MORE ATTENTION AND THE BLM SHOULD WORK TO INCREASE THE POPULATION SO IT IS NO LONGER AN ENDANGERED SPECIES RATHER THAN JUST SUSTAIN ITS PRESENT POPULATION. MORE CONCERN SHOULD ALSO BE GIVEN TO CACTI THAT ARE IMPACTED AS A RESULT OF A CONCENTRATION OF CAMPERS IN THE LONG TERM VISITOR AREAS.

3 SEVERAL OF THE YUMA AUDUBON MEMBERS HAVE INDICATED AN INTEREST IN GOING OUT TO THE WSA'S AND SMA'S IN ORDER TO DETERMINE THE PRESENCE OF THE SPECIAL STATUS SPECIES OF ANIMALS AND PLANTS.

4 THE PLAN SEEMS TO ALLOW FOR AN UNLIMITED EXPANSION OF EXTENSIVE RECREATION AREAS ALONG THE COLORADO RIVER. WE FEEL THAT THE BLM SHOULD SET SOME LIMITS ON HOW MUCH LAND WILL BE PROVIDED FOR INTENSIVE RECREATION SO THAT RIPARIAN AREAS AND THEIR WILDLIFE ARE PROTECTED. WE RECOMMEND THAT THE BLM ADOPT SOMETHING SIMILAR TO ALTERNATIVE D FOR RECREATION. WE AGREE IN GENERAL WITH BLM'S PROPOSAL ON R.V. USE, BUT BLM NEVER DEFINES WHAT EXISTING ROADS AND TRAILS IS. ARE THEY THE ROADS AND TRAILS EXISTING AS OF SEPTEMBER 1979, AS MENTIONED IN THE INTERIM, OR THE USE DESIGNATION WE RECOMMEND THAT BLM EVENTUALLY DESIGNATE WHICH ROADS AND TRAILS ARE OPEN TO VEHICLE USE SO THAT THERE IS NO DOUBT ENCLOSED AREAS WITH SENSITIVE RESOURCES SUCH AS ANIMAL BREEDING AREAS AND RARE PLANTS AND SIGNIFICANT

5

46

5 CULTURAL RESOURCES.

THE TERM EXISTING CAN MEAN TOO MANY DIFFERENT THINGS TO TOO MANY PEOPLE TO BE MANAGEABLE. THE LAND DISPOSAL MAPS ARE CONFUSING. ONE EXAMPLE BEING THE

6 D-4 AREAS SHOWN ON MAP NINE. WE HOPE THAT THE BLM WILL SHOW MORE CLEARLY WHICH FEDERAL LANDS ARE PROPOSED FOR DISPOSAL RATHER THAN JUST SHOWING THE LARGER AREA IN WHICH THEY ARE LOCATED ALONG WITH OTHER PRIVATE AND PUBLIC LANDS.

FINALLY, WE FEEL THAT BLM'S MONITORING PLAN SHOULD HAVE BEEN PART OF THE DRAFT STATEMENT. WHAT

7 WILL BE MONITORED AND AT WHAT POINT WILL ACTION BE TAKEN TO PREVENT DEGRADATION OF A RESOURCE.

SINCE WE WON'T FIND OUT UNTIL THE FINAL RPM, THE ONLY ALTERNATIVE IS TO APPEAL RATHER THAN COMMENT IN MEETING WITH BLM. THANK YOU FOR THE OPPORTUNITY TO COMMENT ON THIS PLAN AND WE LOOK FORWARD TO WORKING WITH YOU IN ORDER TO RESOLVE OUR CONCERNS ABOUT RESOURCE PROTECTION EXPRESSED HERE TONIGHT WHICH WILL APPEAR IN OUR MORE EXTENSIVE WRITTEN COMMENTS. THANK YOU.

MR. MCCLURE: THANK YOU, MS. MICHEL. IS THERE ANYONE ELSE IN THE AUDIENCE THAT WISHES TO SPEAK?

MR. MCBRIDE: I WOULD LIKE TO SAY SOMETHING.

MR. MCCLURE: PLEASE COME AND TAKE THE PODIUM.

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48

1 THE RIVER WITHOUT DAMAGE TO EITHER COUNTRY. AND WE, AS I SAY, WE WANT TO MAKE SURE THAT THAT DOES NOT CONFLICT WITH THE PLAN OF THE BUREAU OF LAND MANAGEMENT. THANK YOU.

MR. MCCLURE: THANK YOU. IS THERE ANYONE ELSE THAT WISHES TO SPEAK TONIGHT?

I APPRECIATE ALL OF YOU ATTENDING TONIGHT, A VERY NICE TURNOUT, AND WE APPRECIATE YOUR COMMENTS. I WANT TO THANK YOU FOR ATTENDING. YOUR VIEWS WILL BE PART OF THE PERMANENT RECORD WHICH WILL REMAIN OPEN FOR FURTHER STATEMENTS OR LETTERS UNTIL APRIL 19, 1985. AGAIN, IF YOU WISH TO WRITE, YOU SHOULD ADDRESS YOUR LETTER TO THE RMP TEAM LEADER, BLM, YUMA DISTRICT, P.O. BOX 5680, YUMA, ARIZONA 85364. THANK YOU FOR ATTENDING. THIS HEARING IS CLOSED.

(WHEREUPON THE HEARING CONCLUDED AT 8:15 P.M.)

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47

C15 MR. MCBRIDE: MY NAME IS MICHAEL MCBRIDE AND I REPRESENT RAY CLOUD MILLS, LTD., AND I WOULD LIKE TO SAY THAT I THINK THE BLM IS MAKING A MISTAKE. THERE HAVE BEEN MANY TIMES THAT I WAS WORKING AT RED CLOUD MINE THAT PEOPLE WOULD COME UP AND THEY NEEDED HELP AND WE WERE THERE TO HELP THEM. IF YOU CLOSE ANY AREAS OFF LIKE THIS, LIKE YOU PROPOSE TO DO, YOU PROBABLY ARE GOING TO HAVE PEOPLE ENDING UP LIKE THE THREE YOUNGSTERS DID A COUPLE OF YEARS AGO IN THE YUMA WASH. THAT'S ALL I HAVE TO SAY.

MR. MCCLURE: THANK YOU. ANYONE ELSE?

C16 MR. BOND: MY NAME IS BOB BOND. I AM WITH THE INTERNATIONAL BOUNDARY AND WATER COMMISSION, THE U.S. SECTION HERE IN YUMA. AND I WOULD LIKE TO EXPRESS A CONCERN OF THE COMMISSION AND THAT IS THAT THE RESPONSIBILITIES OF THE COMMISSION UNDER VARIOUS INTERNATIONAL TREATIES AND AGREEMENTS DO NOT CONFLICT WITH THE RESPONSIBILITIES OF THE BUREAU OF LAND MANAGEMENT AND ITS RESOURCE MANAGEMENT PLAN.

THE ONE AREA THAT I REFER TO IS THE

1 REQUIREMENT OF THE COMMISSION TO MAINTAIN THE FLOOD CARRYING CAPACITY OF THE COLORADO RIVER DURING -- IN ITS INTERNATIONAL REACH FROM THE NORTHERLY INTERNATIONAL BOUNDARY TO THE SOUTHERLY INTERNATIONAL BOUNDARY. THE COMMISSION HAS A RESPONSIBILITY TO MAINTAIN THAT AND IN DOING IT CLEARS THAT SECTION OF THE RIVER EVERY YEAR, EVERY YEAR THAT THE RIVER PERMITS, THAT IS, TO INSURE THAT FLOOD WATERS CAN PASS DOWN

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PUBLIC HEARING ON YUMA DISTRICT DRAFT RMP-EIS

Phoenix, Arizona

Tuesday, March 5, 1985

7:00 P.M.

The court reporter failed to show up for the Phoenix hearing so transcripts of the proceedings are not available. The following written statements either summarize or reproduce verbatim the testimony provided by the six speakers at the hearing. The accuracy of these statements has been verified by signature of the speakers.

THE YUMA METROPOLITAN AREA NEEDS NEARBY WILDERNESS LIKE THE MUGGINS MOUNTAINS WSA 5-53. THE MINING CLAIMS ARE POST FLPMA AS THE ARMY HAD WITHDRAWN THE AREA.

PROPOSING THE CROSSMAN PEAK WSA 5-7b FOR WILDERNESS WILL PRESERVE THE SCENIC VALUES THE BLM HAS RECOGNIZED IN PROPOSING IT AS A NATURAL SCENIC AREA WHILE ENHANCING THE RECREATION DIVERSITY FOR THE LAKE HAVASU CITY AREA.

THE GIBRALTAR MOUNTAIN WSA 5-12 PROVIDES IMPORTANT HABITAT FOR BIGHORN SHEEP. WILDERNESS DESIGNATION FOR THE AREA WOULD PROTECT THIS HABITAT AND PROVIDE HUNTERS WITH AN "ALASKA STYLE BIG GAME HUNT" IN ARIZONA. THE 6020 ACRES OF MINERAL SUBSURFACE ESTATE SHOULD BE ACQUIRED SO THAT THE WSA CAN BE EXPANDED TO A FULL 10,460 ACRES.

THANK YOU.

I CERTIFY THAT THE FORECOING STATEMENT IS AN ACCURATE RECORD OF THE COMMENTS I PRESENTED AT A PUBLIC HEARING CONCERNING THE BUREAU OF LAND MANAGEMENT'S DRAFT YUMA DISTRICT RESOURCE MANAGEMENT PLAN AND ENVIRONMENTAL IMPACT STATEMENT HELD IN PHOENIX, ARIZONA, ON TUESDAY, MARCH 5, 1985, AT 7 P.M.

Drew Crook — Signature

1 May 85 — Date

D1 TESTIMONY PRESENTED BY DREW CROOK CONCERNING THE YUMA DISTRICT DRAFT RESOURCE MANAGEMENT PLAN. PHOENIX, ARIZONA, MARCH 5, 1985.

I VIGOROUSLY PROTEST BLM'S REFUSAL TO RECOMMEND AREAS OF HIGH WILDERNESS VALUES BECAUSE OF ANY POSSIBILITY OF MINERAL POTENTIAL IN THE AREA. THE DECISION OF WHETHER AN AREA'S WILDERNESS VALUES ARE DOMINATE OVER ITS MINERAL POTENTIAL WILL BE MADE BY CONGRESS NOT THE BLM.

I ENDORSE TRANSFERRING ALL OF WSA 5-31 (KOFA 3 SOUTH) AND 5-33 (KOFA 4 NORTH) TO THE KOFA NATIONAL WILDLIFE REFUGE FOR WILDERNESS. I AM PARTICULARLY CONCERNED THAT THE PORTION OF THE CASTLE DOME MOUNTAINS NOT IN THE REFUGE NOW BE INCLUDED IN THE TRANSFER.

ALL OF THE TRIGO MOUNTAINS WSAs 5-23a and 5-23b, WHICH ARE ADJACENT TO WILDERNESS AREAS PROPOSED BY THE IMPERIAL NATIONAL WILDLIFE REFUGE SHOULD BE TRANSFERRED TO THE REFUGE FOR INCLUSION IN THEIR WILDERNESS PROPOSAL.

THE BLM SHOULD RECOMMEND ALL 70,360 ACRES OF THE CACTUS PLAIN WSA 5-14a/b AND ALL 13,735 ACRES OF THE EAST CACTUS PLAIN WSA 5-17. YOU SHOULD ALSO ACQUIRE THE 3680 ACRES OF STATE LAND NEEDED TO COMPLETE THE AREA. IN THE INTERIM, THE BLM SHOULD BETTER CONTROL ORV USAGE AND GRAZING TO PROTECT THE UNIQUE VEGETATION SITUATIONS IN THESE AREAS.

I PROTEST THE DROPPING OF SWANSEA WSA 5-15a BECAUSE OF ITS MINERAL POTENTIAL. I UNDERSTAND THE WSA HAS NO RECORD OF MINERAL PRODUCTION IN OVER A CENTURY.

D2 TESTIMONY OF JONI BOSH FOR THE GRAND CANYON CHAPTER OF THE SIERRA CLUB AND THE ARIZONA WILDERNESS COALITION ON THE YUMA DISTRICT RESOURCE MANAGEMENT PLAN. PHOENIX, ARIZONA, MARCH 5, 1985.

THANK YOU FOR OFFERING THIS CHANCE TO COMMENT ON THE YUMA DISTRICT PLAN IN PHOENIX. THESE ARE LANDS WE USE AND CARE ABOUT, EVEN THOUGH THEY ARE SEVERAL HOURS AWAY. A PHOENIX HEARING IS GREATLY APPRECIATED FOR THOSE OF US WHO WANT TO MAKE A STATEMENT BUT WHO CANNOT EASILY MAKE THE TRIP TO THE YUMA DISTRICT ON A WEEKNIGHT.

MY NAME IS JONI BOSH, AND I AM SPEAKING TONIGHT AS VICE CHAIR OF THE GRAND CANYON CHAPTER OF THE SIERRA CLUB AND AS COORDINATOR FOR THE ARIZONA WILDERNESS COALITION.

I WOULD LIKE TO ADDRESS JUST THE WILDERNESS ASPECTS OF THE PLAN TONIGHT.

FIRST, I'D LIKE TO OFFER SOME COMMENTS ON INDIVIDUAL WILDERNESS STUDY AREAS, AND THEN I HAVE SOME GENERAL COMMENTS TO CLOSE WITH.

THE REASONS GIVEN FOR NOT PROPOSING CROSSMAN PEAK FOR WILDERNESS ARE THAT THE WILDERNESS VALUES HERE ARE NOT NOTEWORTHY AND THERE IS POTENTIAL FOR MINING. THE DRAFT PLAN PROPOSES INSTEAD TO DECLARE THIS AREA A NATIONAL SCENIC AREA. THE YUMA DISTRICT SHOULD MAKE UP ITS MIND WHAT IT WANTS FOR THIS AREA.

IT SEEMS STRANGE TO RECOGNIZE AN AREA AS A NATIONAL SCENIC RESOURCE WHILE SAYING IT ISN'T PRETTY ENOUGH TO BE A WILDERNESS. IT IS CLEARLY CONTRADICTORY TO ALLOW MINING IN AN AREA THAT IS DESIGNATED FOR SPECIAL SCENIC MANAGEMENT.

2

THE ONLY WAY THIS MAKES SENSE IS IF THE DESIGNATION OF NATIONAL SCENIC AREA DOESN'T MEAN ANYTHING, AND WE'RE AFRAID THAT IS INDEED THE CASE. IF SCENERY IS TO BE PROTECTED, THEN THE AREA SHOULD BE PROPOSED FOR WILDERNESS BECAUSE WE KNOW THAT DESIGNATION WILL DO THE JOB.

WE CHALLENGE THE BLM'S JUDGEMENT THAT THIS AREA IS NOT AN OUTSTANDING WILDERNESS CANDIDATE. THE BLM'S OWN WORDS CORRECTLY DESCRIBE THE AREA AS HAVING "COMPLEX TOPOGRAPHY" WITH "SURPRISING DIVERSITY OF TERRAIN, VEGETATION AND WILDLIFE [MAKING] IT HIGHLY DESIRABLE FOR ACTIVITIES INVOLVING FOOT OR HORSEBACK TRAVEL." THE AREA HAS "SWEEPING" VISTAS OF SURROUNDING AREAS. AS A SCENIC BACKDROP AND NEARBY RECREATION SPOT FOR LAKE HAVASU CITY, CROSSMAN PEAK WOULD SEEM IDEAL FOR WILDERNESS DESIGNATION.

THE GIBRALTOR MOUNTAINS REPRESENT A CAPITULATION TO THE STATUS QUO. THE BLM RECOGNIZES THE HIGH-QUALITY WILDERNESS THAT THE AREA CONTAINS, INCLUDING HABITAT FOR PEREGRINE FALCONS AND BALD EAGLES AS WELL AS STUNNING LANDFORMS.

IT WOULD SEEM WELL WORTH TRYING TO EXCHANGE OUT OR BUY THE PRIVATE MINERAL ESTATES, BUT THE BLM CITES "THE PROBLEMS OF ESTAB SHING FAIR MARKET VALUE FOR MINERALS" AS THE REASON NOT TO TRY. THIS IS NOT VERY CONVINCING, ESPECIALLY SINCE THE BLM IN OTHER PARTS OF THE STATE IS NOW ACTIVELY ENGAGED IN EXACTLY THIS TYPE OF TRADING. RECENTLY THE KINGMAN RESOURCE AREA MOVED AHEAD WITH A TRADE BETWEEN THE STATE AND BLM INVOLVING 130,000 ACRES OF SPLIT ESTATE LANDS. THE STATE IS NOW INVOLVED IN A THREE-WAY TRADE WITH BLM AND THE FISH

3

AND WILDLIFE SERVICE IN CONSOLIDATING SURFACE AND SUBSURFACE HOLDINGS IN SEVERAL LOCATIONS, INCLUDING NEIGHBORING IMPERIAL, HAVASU AND KOFA NATIONAL WILDLIFE REFUGES.

THE PROCESS OF ACQUIRING MINERAL ESTATES IS ESTABLISHED, UNDERSTOOD AND PRACTICED IN MANY PLACES IN ARIZONA BY THE BLM. THE YUMA DISTRICT SHOULD MORE THOROUGHLY INVESTIGATE THE POSSIBILITIES FOR MINERAL TRADES IN THE GIBRALTOR MOUNTAINS.

THE CACTUS PLAIN AREA IS CLEARLY A UNIQUE AND WORTHY ADDITION TO THE NATIONAL WILDERNESS PRESERVATION SYSTEM, AND THE BLM DESERVES PRAISE FOR RECOMMENDING IT FOR WILDERNESS. HOWEVER, THE NEIGHBORING EAST CACTUS PLAIN SHOULD BE RECOMMENDED FOR PROTECTION AS WELL BECAUSE THESE AREAS ARE UNIQUE.

SINCE THE BLM HAS NOT PROPOSED ANY OTHER AREA ON THE ARIZONA SIDE OF THE YUMA DISTRICT FOR WILDERNESS, THERE IS NO REASON TO BE MODEST HERE. DROPPING EAST CACTUS PLAIN BECAUSE IT DUPLICATES CACTUS PLAIN, AND CUTTING 20,000 ACRES OF CACTUS PLAIN FOR TOWNSITE EXPANSION BY PARKER ARE COMPROMISES THAT ARE GOING OVERBOARD. THERE ARE HUNDREDS OF THOUSANDS OF ACRES IN THE YUMA DISTRICT ALONE WHICH HAVE BEEN LEFT OPEN FOR DEVELOPMENT. THE ADDITIONAL ACRES IN WILDERNESS WOULD ADD MUCH MORE IN PRESERVATION VALUE THAN THEY WOULD IN DEVELOPMENT OPPORTUNITY. AND IF THE BLM IS GOING TO PROTECT THE EAST CACTUS PLAIN AS IS PROPOSED, THEN THERE IS NO REASON NOT TO INCLUDE IT, TOO, IN A WILDERNESS RECOMMENDATION.

4

ONE ADDITIONAL COMMENT ON THESE AREAS. GRAZING SHOULD BE ELIMINATED TO PROTECT THE VEGETATIVE VALUES WHICH MAKE THESE AREAS SO SPECIAL AND FOR WHICH THE CACTUS PLAIN IS BEING RECOMMENDED FOR WILDERNESS. WHILE WILDERNESS DESIGNATION ITSELF ALLOWS THE CONTINUATION OF GRAZING, THE BLM SHOULD TAKE THE NEXT STEP TOWARDS COMPLETE PROTECTION OF THIS ECOSYSTEM BY ELIMINATING GRAZING ALTOGETHER FROM THESE PLACES TO ALLOW A TRULY NATURAL SUCCESSION OF PLANT AND ANIMAL LIFE TO OCCUR.

THE SWANSEA AREA IS AS DESERVING OF WILDERNESS PROTECTION AS THE OTHER AREAS IN THE LAKE HAVASU REGION, SO IT WAS A SHAME TO SEE THAT IT FELL VICTIM TO ALLEGED MINERAL POTENTIAL. WITH SO MUCH OF THE REST OF THE YUMA DISTRICT PROPOSED TO BE OPEN FOR MINING, IT'S DIFFICULT TO SEE WHY THIS AREA WOULD MAKE MUCH DIFFERENCE TO THE NATION'S STRATEGIC MINERALS STOCKPILE.

THE BLM POINTS OUT THAT NO RECORDED PRODUCTION HAS OCCURRED IN THE WSA SINCE 1862, EVEN THOUGH COPPER, GOLD AND SILVER WERE BEING PRODUCED ALL AROUND IT UP THROUGH 1970. SWANSEA DOES NOT SOUND LIKE AN AREA RIPE WITH MINERAL VALUE.

YET VALUES ARE KNOWN FOR WILDERNESS, INCLUDING A HALF-MILE RIPARIAN ZONE. SURELY NOWDAYS THIS RIPARIAN AREA IS FAR MORE UNIQUE AND VALUABLE A RESOURCE THAN YET ONE MORE MINING CLAIM IN YET ONE MORE PLAYED- OUT MINERAL DISTRICT.

THE TRIGO AND SOUTH TRIGO MOUNTAINS SHOULD BE CONSIDERED FOR INCLUSION WITH THE IMPERIAL NATIONAL WILDLIFE REFUGE. IT'S OBVIOUS THAT THE BLM DOES NOT WANT TO PROTECT THEM FROM MINING EVEN THOUGH THEY BORDER A WILDLIFE REFUGE WILDERNESS PROPOSAL AND ARE YEAR-ROUND HABITAT FOR DESERT BIGHORN SHEEP.

5

THE TWO AREAS ARE EXTREMELY RUGGED, MATCHING THE NEIGHBORING REFUGE LANDS. THEY LIE BETWEEN THE REFUGE AND THE YUMA PROVING GROUNDS, AND WOULD THEREFORE PROBABLY BE EASIER MANAGED BY EITHER OF THOSE AGENCIES RATHER THAN THE BLM.

THE BLM HAS AN OPPORTUNITY TO MANAGE THESE AREAS THROUGH WILDERNESS DESIGNATION AS A PROTECTIVE BUFFER TO THE REFUGE AND AS AN IMPORTANT WILDLIFE AND SCENIC AREA IN THEIR OWN RIGHT. BY ALLOWING MINING TO OCCUR HERE, THE BLM THREATENS THE REFUGE LANDS WHICH LIE DOWNHILL AND WHICH ARE OF TOO LITTLE ACREAGE TO PROTECT THEMSELVES FROM NEIGHBORING ACTIVITIES.

KOFA UNITS 3 SOUTH AND 4 NORTH ALSO DESERVE TO BE TRANSFERRED TO THE FISH AND WILDLIFE SERVICE FOR ADDITION TO THE KOFA NATIONAL WILDLIFE REFUGE. THE BLM DESCRIBES BOTH OF THEM, QUITE CORRECTLY, AS BEING "INTEGRAL PART[S] OF THE MOUNTAINOUS AREA EMBRACED IN THE CONTIGUOUS WILDLIFE REFUGE UNIT. IT SHOULD BE ADDED THAT THE REFUGE LANDS NEXT TO BOTH THESE AREAS HAVE BEEN RECOMMENDED FOR WILDERNESS.

THESE ARE TWO AREAS THAT FORMER INTERIOR SECRETARY JAMES WATT DROPPED FROM THE BLM's WILDERNESS REVIEW. NOW THE YUMA DISTRICT HAS REAFFIRMED THAT THE BLM REALLY DOESN'T WANT THEM PROTECTED AS WILDERNESS. TOPOGRAPHICALLY, THEY ARE ALREADY PART OF THE KOFA REFUGE, SO LET'S GIVE THEM TO THE REFUGE WHERE THEY BELONG AND WILL BE CARED FOR.

THE MUGGINS MOUNTAINS ARE AN ABSOLUTE MUST FOR WILDERNESS PROTECTION. THEY ARE A MARVELOUS WILDERNESS RECREATION OPPORTUNITY FOR THE GROWING POPULATION OF THE YUMA AREA, AND THEY ARE OUTSTANDINGLY RUGGED AND SCENIC.

THE BLM TRAGICALLY CONFUSES THE EXISTENCE OF MINING CLAIMS WITH MINERAL POTENTIAL. THE FACT THAT THE MUGGINS WERE CLOSED FOR YEARS TO MINERAL ENTRY AS PART OF THE YUMA PROVING GROUNDS PROBABLY ACCOUNTS FAR MORE FOR THE RECENT FILING OF MINING CLAIMS THAN ANY REAL DEVELOPMENT PROMISE. IN FACT, THE BLM's OWN DESCRIPTION OF THE MINERAL VALUES SAYS THAT GOLD, THE ONE MINERAL HISTORICALLY PRODUCED HERE, OCCURS IN DEPOSITS THAT "ARE PROBABLY TOO SMALL TO BE CONSIDERED AS A RESOURCE."

THE MUGGINS DESERVE BETTER THAN THAT. THEY DESERVE WILDERNESS PROTECTION.

IN CONCLUSION, I'D LIKE TO ADD A FEW THOUGHTS ON WHERE WE GO FROM HERE.

THERE HAS BEEN SOME TALK OF THE BLM TRYING TO PUT TOGETHER A STATEWIDE WILDERNESS PROPOSAL THAT REPRESENTS A COMPROMISE, IF NOT A CONSENSUS, BETWEEN VARIOUS INTEREST GROUPS. I CANNOT SEE HOW WE'RE READY FOR THAT GIVEN THE PALTRY WILDERNESS RECOMMENDATIONS WE'VE SEEN IN THE DRAFT PLAN UNDER DISCUSSION TONIGHT.

WHEN ANY RESOURCE CONFLICT AT ALL, POTENTIAL OR REAL, IS CAUSE TO DROP AN AREA — WHERE IS THE COMPROMISE?

WHEN PRIME WILDLIFE AND WILDERNESS LANDS BORDERING WILDLIFE REFUGE WILDERNESS PROPOSALS ARE NOT FOUND SUITABLE — WHERE IS THE SENSITIVITY TO THE WILDLAND RESOURCE?

SUCH HESITANT, MODEST WILDERNESS PROPOSALS AS FOUND IN THE YUMA DISTRICT PLAN DO NOT GIVE WILDERNESS ADVOCATES ANY MOTIVATION TO PUSH FOR RESOLUTION OF THE

WILDERNESS QUESTION IN WESTERN ARIZONA. EVEN DEFENDING THE AREAS AGAINST INTERIM MANAGEMENT INTRUSIONS SEEMS PREFERABLE TO OPENING ALMOST ALL OF THESE WONDERFUL PLACES UP TO DEVELOPMENT.

PLEASE RECONSIDER YOUR NON-WILDERNESS PROPOSALS FOR THESE SPECIAL LANDS YOU MANAGE.

THANK YOU FOR THE OPPORTUNITY TO COMMENT HERE TONIGHT.

I CERTIFY THAT THE FOREGOING STATEMENT IS AN ACCURATE RECORD OF THE COMMENTS I PRESENTED AT A PUBLIC HEARING CONCERNING THE BUREAU OF LAND MANAGEMENT'S DRAFT YUMA DISTRICT RESOURCE MANAGEMENT PLAN AND ENVIRONMENTAL IMPACT STATEMENT HELD IN PHOENIX, ARIZONA, ON TUESDAY, MARCH 5, 1985, AT 7 P.M.

Signature — Date 4-1-85

ARIZONA MINING ASSOCIATION

C J HANSEN
President

THE COMMENTS OF
THE ARIZONA MINING ASSOCIATION
ON THE BUREAU OF LAND MANAGEMENT
YUMA DISTRICT
DRAFT RESOURCE MANAGEMENT PLAN AND
DRAFT WILDERNESS ENVIRONMENTAL IMPACT STATEMENT
PHOENIX, ARIZONA
MARCH 5, 1985

D3 I am Jack Pursley, Director of Public Affairs of the Arizona Mining Association. The Association represents the 15 major mining companies that produce most of the copper, molybdenum, silver and gold in the state.

1 I am commenting here today because the Association is seriously concerned about the continuing actions of the Federal government to remove and restrict public lands from productive use. Approximately two-thirds of all public lands in the United States are now effectively withdrawn from mineral development. In Arizona, existing wilderness areas total 2,000,000 acres and it has been determined that approximately 30 million additional acres (two-thirds of the Federal lands in Arizona) are unavailable or highly restricted to mineral resource development by other withdrawals including BLM Wilderness Study Areas, Forest Service Wilderness Study Areas, Primitive Areas, Scenic Areas, Game Preserves and Refuges, Parks and Monuments, Defense Department withdrawals, Indian Reservations and numerous other

2702 N. Third Street · Suite 2015 · Phoenix, Arizona 85004 · (602) 266-4416

withdrawals. Each of these categories has been formed by individual withdrawal actions with little or no consideration to the cumulative effect of all withdrawals in Arizona. The Association feels that this cumulative effect must be addressed and considered in this EIS.

1 The Resource Management Plan (RMP) for the Yuma District proposes as its preferred alternative to designate as wilderness 51,510 acres in two Wilderness Study Areas. Initially, this recommendation appears to be a reasonable compromise. The RMP states that, under the preferred alternative plan being recommended, only four percent of the BLM-managed lands would be recommended for wilderness designation (page 22). However, this figure is very deceiving since it seems to downplay the large number of land areas in the Yuma District already withdrawn from mining or on which future restrictions on mining can be expected.

In addition to the 51,510 acres proposed for wilderness, the RMP also proposes to transfer 980 acres to the U.S. Fish and Wildlife Service for wilderness, 5,280 acres will be withdrawn under an Area of Critical Environmental Concern, 4,110 acres of land administered by the U.S. Fish and Wildlife Service have been recommended for wilderness, and there currently exists 275,000 acres within the Yuma District that are subject to Bureau of Reclamation withdrawals. These figures add up to a total of 336,880 acres which comprise approximately 28 percent of the total (1.2 million acres) of public lands administered within the Yuma District.

2 In addition to these withdrawals, there are 426,425 acres of land, including cultural resource sites, scenic areas, lands managed under special restrictions and priority wildlife habitat areas, on which there will be land management restrictions. Although the RMP provides that mining will be permitted in these latter areas, it is quite likely, as a practical matter, that approval of plans of operations will be more difficult to obtain without numerous and perhaps onerous restrictions being placed upon the mine operator. The total of the withdrawn lands and the restricted-use lands within the Yuma District equals 763,305 acres, or approximately 64 percent of the total land administered therein. The concern of the Arizona Mining Association is that these restrictions will not allow the systematic evaluation of subsurface resources within the Yuma District. With a number of recent gold and silver discoveries and mine developments occurring near the California-Arizona border such as the Picacho, Potholes, Fortuna, Mesquite and Cargo gold deposits and the silver deposits of Sheep Tanks and the Silver District near the Imperial National Wildlife Refuge, the Association believes we can ill afford to withdraw or restrict these lands prior to a thorough mineral evaluation. As Joe Wilkins, Jr. of St. Joe American Corporation states in his treatise on The Distribution of Gold - and Silver-bearing Deposits in the Basin and Range Province, Western United States, "the overall spatial and temporal distribution of (gold and silver) deposits within the Mohave Block (the area in which the Yuma BLM district occurs) may not represent an absence of mineralization or an inadequacy

of other geologic contents, but may be artificially induced by the vast tracts of lands withdrawn from mineral entry." The Arizona Mining Association is currently conducting a detailed review of the WSAs within the Yuma District for their mineral potential. We will submit written comments prior to the April 19, 1985 deadline.

3 I wish to discuss two other areas of concern to the Association. First, the RMP is deficient in not reviewing the appropriateness of the 275,000 acres of land within the district that is presently subject to Bureau of Reclamation withdrawals. According to the Federal Land Policy and Management Act (FLPMA), the Secretary of the Interior is to develop land use plans for all public lands regardless of whether the lands previously have been withdrawn. FLPMA, Section 202(a). Additionally, there is inadequate consideration given in the RMP to the combined effect of the Bureau of Reclamation withdrawals and those additional BLM withdrawals proposed in the RMP?

Secondly, at page 11 of the RMP it states that "the areas reviewed by Congress but not added to the National Wilderness Preservation System would be managed in accordance with other applicable guidance provided by this RMP." Later in the RMP, under item #18 on page 80, it states that lands recommended as unsuitable for wilderness preservation "eventually" would be released from further wilderness and returned to multiple use management or other uses indicated in the RMP. For those WSAs not recommended for wilderness and that are not included in the

Special Management Area, Priority Wildlife Habitat Area or Area of Critical Environmental Concern, the RMP lacks guidance for future land management. It is the Arizona Mining Association's contention that those WSA lands not recommended for wilderness or other special use areas should be immediately returned to multiple use management.

The Arizona Mining Association will submit more detailed comments prior to the April deadline. At this time, we feel that the RMP/EIS is inadequate in a number of respects. In particular, we are certain that the RMP/EIS should be redrafted to more fully reflect the cumulative effect of all withdrawals in Arizona in the context of the U.S. mineral policies currently in effect. The Arizona Mining Association is most willing to provide that assistance to the BLM in this endeavor.

We appreciate this opportunity to submit these comments.

Amax Arizona, Inc.
Anamax Mining Company
Anaconda Minerals Company
ASARCO, Incorporated
Callahan Mining Corporation
Casa Grande Copper Company
Cyprus Bagdad Copper Company
Cyprus Johnson Copper Company
Duval Corporation
Inspiration Consolidated Copper Company
Kennecott
Magma Copper Company
Noranda Lakeshore Mines, Inc.
Phelps Dodge Corporation
Pinto Valley Copper Corporation

I CERTIFY THAT THE FOREGOING STATEMENT IS AN ACCURATE RECORD OF THE COMMENTS I PRESENTED AT A PUBLIC HEARING CONCERNING THE BUREAU OF LAND MANAGEMENT'S DRAFT YUMA DISTRICT RESOURCE MANAGEMENT PLAN AND ENVIRONMENTAL IMPACT STATEMENT HELD IN PHOENIX, ARIZONA, ON TUESDAY, MARCH 5, 1985, AT 7 P.M.

R. Pinley — Signature

3-27-85 — Date

D4

Arizona Commission of
Agriculture and Horticulture

1688 WEST ADAMS • PHOENIX, ARIZONA 85007 • (602) 255-4373

FIELD SERVICES

State Agricultural Laboratory
Fruit & Vegetable Standardization

District Offices
Inspection Stations

Office of State Chemist
Board of Pesticide Control

DATE: March 21, 1985

TO: Dennis Turowski, Planning Team Leader
BLM, Yuma District Office

FROM: R. A. Countryman, Director, Western Region R.A. Countryman
Arizona Commission of Agriculture and Horticulture

SUBJECT: Yuma District Resource Management Plan and Environmental Impact Statement
(Quartsite Tourist Impact on Yuma District Lands and Vegetation)

On March 5, 1985 at the Maricopa Supervisors' Auditorium at 7 p.m. before the BLM hearing officer, Lawrence McHenry, the following statement was made:

"The Arizona Commission of Agriculture and Horticulture have been working in cooperation with BLM regarding enforcing the Native Plant Law requirements in the Quartsite area where for four to six months visitors come into the Quartsite area and camp out and impact the protected native plants in the area."

Listed are some of the environmental problems impacting this area:

1

1. Sanitation - RV's, trailers and all other camping methods - not sufficient dump stations for approximately 30,000 people and during the Pow Wow some 100,000 people are in the area for approximately three weeks. Facilities are limited to non-existant; for many they dump or use the desert.

2. Water - Limited facilities for water which impacts the whole area where drinking water is at a premium.

3. Native Plant Law problems result when the visitors have to have a fire to sit around each night and the only fuel supply are the two protected native trees, palo verde and ironwood. With written permission of the landowner, the law allows a person to take less than a cord of wood. The state laws governing these protected native trees on federal land is that state authorities honor all federal wood permits.

(Prefatory Statement)

Mrs. Carolina Butler
TESTIMONY PRESENTED BY (YOUR NAME HERE) CONCERNING THE YUMA DISTRICT DRAFT RESOURCE MANAGEMENT PLAN. PHOENIX, ARIZONA. MARCH 5, 1985.

(NARRATIVE RECOUNTING ORAL TESTIMONY HERE)

(Closing or certifying Statement)

I CERTIFY THAT THE FOREGOING STATEMENT IS AN ACCURATE RECORD OF THE COMMENTS I PRESENTED AT A PUBLIC HEARING CONCERNING THE BUREAU OF LAND MANAGEMENT'S DRAFT YUMA DISTRICT RESOURCE MANAGEMENT PLAN AND ENVIRONMENTAL IMPACT STATEMENT HELD IN PHOENIX, ARIZONA, ON TUESDAY, MARCH 5, 1985, AT 7:00 P.M.

Carolina Butler — Signature
4-18-85 — Date

Mrs. Carolina Butler
11837 N. Paradise Drive
Scottsdale, Ariz 85254
(602) 948-6824

Additional comments are also being mailed under separate cover.

Memorandum
March 21, 1985
Dennis Turowski
Page 2

The agreement the Commission worked out at our meeting at Quartsite two years ago was as follows:

A. Dead and downed wood, no more than twenty pounds per individual camp site per stay during the season. This was stated before one thousand persons at the meeting center in Quartsite.

B. It was also agreed between BLM and ACAH that any federal permit issued, even for less than a cord, would also have to get a Native Plant Permit, in order to assist in the enforcement of the law in the area.

1

C. The dead and downed wood has been stripped from the area, either by permit or no permit, as well as live tree cutting. Large stacks of wood and ash-filled fire rings and fire pits are evidence of large amounts of wood being consumed on a regular basis. In our investigation of the area in question, it was noted that semi-permanent camps were moved up and down wash areas in order to be by a convenient supply of wood.

D. The ecology of the area is being destroyed. This is a low rainfall area and reproduction of the trees, which is by seed, under these conditions is almost non-existant. The shelter that the dead and downed wood provides for plants and animals is lost. The heavy continuous traffic on this desert pavement contributes to the erosion as the resulting loss of vegetation due to the low rainfall.

E. The BLM needs an immediate plan to provide some control over the continued destruction of an unique desert ecology. If action is taken soon, this area would take as much as a hundred years to recover under the present climatic conditions.

F. BLM needs more manpower in the area to handle the problem, including an enforcement officer. ACAH, on a limited budget and manpower in the area served from Ehrenberg and Parker, aren't able to check the area frequently enough to keep the wood theft under control.

D5

April 18, 1985

Planning Team Leader
Bureau of Land Management
Yuma District
P.O. Box 5680
Yuma, Arizona 85364-0697

RECEIVED BLM YUMA DISTRICT APR 22 3 3 AM '85 YUMA, ARIZONA

Re: Draft Yuma District Resource Management Plan and EIS

Dear Sir:

Please include these comments as part of your public input record. They augment my oral testimony of 3-5-85 in Phoenix. Thank you.

1

Arizona's western boundary, the Colorado River, is one of the state's most important and most celebrated natural features. In the relatively few years that white settlers moved in on the native people, the river has been altered drastically. I feel it is imperative to move now and protect all of the 336,400 acres identified as key wildlife habitat. I find it especially sad that only 25,000 acres of riparian habitat has been will be protected. In other words, only 2% of the 1,192,000 acres of the Yuma District along the mighty Colorado River. That small amount is a disgrace and I think most Americans would be shocked as I am.

Cultural Resources: I know that research and study is not complete on prehistoric people in Arizona and even today the government is not aware of what places are culturally significant. There are also some places which today's native people still utilize and outsiders are not told. I can only urge the government to take the incomplete research into consideration and involve the various river tribes in all planning.

I certainly cannot agree with the recommendation to increase cattle grazing use to 7,754 animal unit months, even on seasonal galleta grass, or even the present AUMs because of the recent draft report released 4-2-85 by BLM stating that the appraised market grazing value in Arizona for public lands was determined to be $5.20 per head per month vs. the 1984 grazing fee of $1.35. This amounts to a whopping subsidy which I would like to eliminate. This latest report also draws the same conclusion many other reports have made in the past. Taxpayers everywhere are tired of costly subsidies and very aware of our federal deficit currently running at $200 billion and the federal debt approaching $2 trillion.

Also, I am not sympathetic to wild horses and burros and am very much concerned about their impacting forage and water supplies for our native wildlife. Is there an economic analysis on the impact of wild horses and burros?

-2-

Whenever I've attended hearings concerning public lands, I always hear spokesmen for the mining, grazing and agriculture interests complaining about preserving wilderness and about removing public lands from use, their use. Government should enlarge its resource management plans and EISs to consider the economic impact of these uses on the whole public and the total picture. It seems to me that mining, grazing and agriculture take a lot but return very little to the total public good or to the total picture.

Agricultural leases and permits should be canceled if they are not paying their way, if it is another subsidy situation. I have attached information showing that here in Arizona, agriculture uses 89% of the state's water but contributes only 1% to Arizona's personal income. This is a poor use of water in an arid state. Also, Arizona was the highest in U.S. per-farm 1982 subsidies. Arizona's major crop is cotton, most of which is sold to Taiwan, Japan and Korea. They employ the labor making cotton clothing selling it back to us at a greater price which contributes to our trade deficit. Attach A.

Government study documents should ask what does this agricultural production cost us in water use, subsidies, chemical damages, trade deficits, diversion of public lands from other uses, etc., so that we may answer the question: Is it worth it?

I feel there is plenty of private, city, county, state and Indian land so that I completely disagree that BLM should maximize recreational opportunities and developments. Since there are plenty of man-made recreational opportunities on both sides of the river (including Hoover Dam nearby), Yuma District BLM lands should provide maximum primitive types of recreation. BLM is appealing to low standards in appreciation for natural values along the river in catering to the "tourist crowd." River recreation in the desert should be managed carefully, it is rare enough. Man-made water attractions are, on the other hand, as easily duplicated as backyard swimming pools.

Winter visitor management should be changed from an 8-mo. limit to one month. (In my oral testimony I suggested 5 months but I was horrified to hear later testimony that these campers were using ironwood for their campfires.) Ironwood trees take many years simply waiting for the right conditions to sprout and then it might take several more to become a mature tree. The wood is used by Seri Indians in Mexico to produce works of art. Thus, ironwood is distinctly valuable in addition to visually pleasing; providing shade, an invaluable desert need; plus its natural role to wildlife and other plants, etc. What other degradation is occurring because of the liberal 8-months permit? Their impact may be producing another Sahel desert-disaster for us in the future. I sympathize with low-income people seeking a place they can afford but when our publiclands are adversely impacted, this social problem should be solved by someone other than BLM.

D6

6947 E. 6th St. #4
Scottsdale, Az. 85251
April 15, 1985

J. Darwin Snell, District Manager
Yuma District Office
Bureau of Land Management
3150 Windsor Avenue
Yuma, Arizona 85365

Dear Mr. Snell:

Following is the testimony I presented concerning the Yuma District Draft Resource Management Plan at the hearing in Phoenix on March 5, 1985. It is reconstructed from notes and memory and may not be a perfect verbatim record, but it accurately reflects the gist of my comments that evening.

I'd like to congratulate the BLM for their wilderness recommendation on the Cactus Plain unit. It's a relatively flat area, not cliffy or mountainous or canyon-cut like most wilderness areas are. We need unusual and diverse landscapes in the wilderness system, and I'm glad the BLM is finally coming around to this realization. My sincere thanks for recommending this unique and outstanding area. However, I would have preferred that the entire Cactus Plain unit be included, all 70,360 acres, plus the 13,735 acres of East Cactus Plain.

I fail to see why Kofa #3 and 4 were not recommended for wilderness. These are small areas adjacent to the Kofa National Wildlife Refuge, and they include the same rugged volcanic mountains and important bighorn habitat as are found within the Refuge. Logically they should both belong within the Refuge since they are merely topographic extensions of the lands the Refuge was designed to protect. The straight-line boundaries took a few wrong jogs and left these small, isolated units to the BLM instead. I would support their transfer to the Fish & Wildlife Service, but failing that the BLM should certainly protect their obvious natural and scenic values by recommending them for wilderness.

The Trigo Mountains and Trigo Mountains South units should also be recommended for wilderness. I visited this area only once, about thirteen years ago, but I still vividly recall the harshness and desolation of this area as contrasted with the lush swamplands and astonishing wildlife sanctuary of the adjacent Imperial Wildlife Refuge. The Trigos are rugged, isolated, and scenic enough to merit wilderness designation on their own, but when viewed in their proper context, bordering on some of the richest riparian lands in the Southwest, they become even more valuable and the arguement for their preservation as wilderness becomes even stronger.

I have little familiarity with the remaining WSA's on the Arizona side of the river - Muggins Mountains, Crossman Peak, Swansea, and the Gibralter Mountains - but I would like to make a general comment

-3-

I feel very strongly that all federal lands in the Yuma District should be retained in public ownership. If BLM makes 45,480 acres available for disposal, it would probably go to private use and then the public would be shut out and harmed by this withdrawal of riverside land.

Wilderness: All 18 WSAs totaling 205,105 acres should be recommended for wilderness designation. If it is not done now, is there comparable land elsewhere? Is there another Colorado River? With Arizona's population currently at 3 million, the public's opportunity for wilderness areas will never be greater. We can release wilderness in the future but we cannot recapture it as easily. Logic tells us to protect the 18 WSAs especially when we see how fast Arizona is growing and Gov. Bruce Babbitt's aggressive push to develop state lands (see attached 6-29-83 ad on Colorado River land north of Bullhead City). ATTACH. B.

I applaud the BLM for a strict floodplain management plan. I feel sorry for all who have suffered from flooding but I am sick and tired of paying for flood damages, costly dams, and other expensive remedies for people's mistakes of building in flood-prone areas. I am especially tired of lax public officials who allow this type foolish development. It is not fair to American taxpayers, who have not built in flood-prone areas, who have protected themselves by purchasing flood insurance, to pay for flood damages for others or to pay for flood control projects to protect existing structures. People who get flooded should be encouraged to move out, not to stay where they are. The best and cheapest flood protection is to keep people and development out of 100-year floodplains. (I also consider the past and present situation in Mohave County and what they have allowed in Bullhead City an outrage and I urge BLM to not remotely duplicate the poor planning which has been done there.) Arizona has suffered widespread flooding in the past eight years along every waterway and we have learned plenty. Our public officials should have no excuse to repeat the mistakes of the past. Attached as additional comment is my letter to the Federal Emergency Management Agency 6-29-83 on Colorado River flooding and subsequent editorial 7-6-83 by The Arizona Republic. attach. C

Thank you for this opportunity to comment on your draft Yuma District Resource Management Plan and Environmental Impact Statement.

Sincerely,

Carolina Butler

Mrs. Carolina Butler
11837 N. Paradise Drive
Scottsdale, Arizona 85254
(602) 948-6824

Attachs.

on the timidity of the BLM whenever there is any appearance of a conflict with wilderness values. Time after time in this document, with the noble exception of Cactus Plain, wilderness loses. If an area is thought by a few individuals to hold some potential for mineral production, regardless of whether any mineralization has ever been proven or any production taken place, the wilderness values that may exist on that land immediately lose their importance and are sacrificed to theoretical economic values. If ORV intrusion is taking place (or even could take place) in a potential wilderness, it is wilderness preservation that becomes problematical rather than the improper or illegal presence of ORV's. Again, wilderness values are sacrificed. BLM has their priorities wrong: wilderness is at least as important as the scattered low-grade mineral deposits that it perhaps includes, or even the gleaming "mother lodes" that it is invariably said (by some, without a shred of evidence) to include. Surely it is at least as important as dune buggies, ATC's, or any of the other noisy, destructive vehicles that have done so much irreparable damage to our Sonoran desert already. Wilderness is a precious and fragile resource, and it's worth can't be measured in dollars or boasted of in Chamber of Commerce brochures. But without question it is a valuable resource, and the BLM should strive to protect and defend it at every opportunity. Not an inch should be sacrificed without far better reasons than are offered in this RMP.

I certify that the foregoing statement is an accurate record of the comments I presented at a public hearing concerning the BLM's draft Yuma District Resource Management Plan and EIS held in Phoenix on March 5, 1985.

Sincerely,

Tom Wright 4-15-85

Tom Wright

Responses to Comments

1-1: Lands and minerals owned by the Santa Fe-Pacific Railroad Company have been considered in the RMP to the extent that they affect acquisitions or disposals identified in the *Land Ownership Adjustments* issue. Adjustments can be made to RMP decisions through BLM's plan amendment process should future development of privately-owned mineral estate warrant a change of land uses or management objectives.

1-2: We do not foresee any impact on development of private minerals as a result of the RMP.

5-1: The population numbers and footnotes in Table 3-8 have been revised.

8-1: The 876 sites are on BLM-administered land within the Yuma District boundary. The 1,200 sites (updated in this final RMP-EIS to 1299 sites) include additional sites that are on lands under another agency or individual's management within or near the District. BLM keeps records of these additional sites to promote better understanding of cultural resources within the larger, regional context. About 380 sites were recorded on the Yuma Proving Ground by BLM in 1982-83 during cultural resource surveys carried out under a contract commissioned by the Proving Ground.

8-2: The bulk of archaeological sites in Yuma District are on the first terrace above the Colorado and Gila River floodplains. These terraces are Early Pleistocene in age, and are the product of fluvial deposition. Post-deposition deflation resulted in the desert pavements which blanket these terraces. Most of the cultural sites date to periods well after the development of the desert pavement. Therefore, all artifacts and features do mingle together on the surface with little or no change to the surface following cultural occupation.

8-3: The inference is correct. There are no known sites with stratified sequences nor sites containing trash middens on BLM lands in Yuma District. Virtually all of the "village" sites on the terraces are pre-ceramic in age, i.e., pre A.D. 900 approximately. All villages after this date were on the floodplain of the two major rivers, and their remains are gone, except two villages which did not get washed away. These two villages are not on BLM-administered land.

8-4: Sites in areas of low cultural resource sensitivity are of extreme low density, are usually in the interior desert, and consist of relatively small temporary occupation areas (one or two night campsites), lightly used trails and occasional small scatters of sherds (single pot breaks) and lithic flakes. Whether in high, moderate, or low sensitivity areas, all cultural resource sites in Yuma District are given the consideration, evaluation and review required by Federal Regulation 36 CFR 800 and the *National Historic Preservation Act* as described in the *Cultural Resources* section of *Management Guidance Common to All Alternatives* (Chapter 2).

8-5: Chapter 3 of the EIS states that "33 sites or areas" are known to be worthy of long range preservation. These are the same sites or areas designated in the *Preferred Alternative for* special management. A number of these areas contain as many as 25 to 50 sites. A total count of sites for the entire 33 sites or areas has not been made; however, we estimate that about 375 sites are contained in the 33 sites or areas.

8-6: See the response to comment 8-1.

8-7: Yuma District does not have a Cultural Resources Management Plan (CRMP) at present. A CRMP is currently being developed for one of the 33 sites and areas designated for special management under the proposed plan—the Big Maria area—but is not yet finalized. Additional plans will be prepared for other sites or areas as funding permits; those having a high potential for conflicting uses will receive priority in developing CRMPs.

8-8: The methodologies that BLM applies to evaluating and managing historic resources are the same as those applied to prehistoric resources.

8-9: Evaluation is only one stage of cultural resources management and protection. In addition to various laws, Yuma District follows guidelines in 36 CFR 800 and the Bureau's 8100 manual for management of cultural resources.

8-10: Socio-cultural Use in *Appendix J* describes one of several types of uses applied to or recognized for cultural resources by BLM. It is not intended as a statement of management or policy. However, BLM is obligated to comply with requirements of the *Archeological Resources Protection Act of 1979* (ARPA).

8-11: Sites which are suffering damage, usually by erosion or ORV traffic, are selected for stabilization or protection. The legal procedures are the same for stabilization as those required for any other action or use which might adversely impact a cultural resource site.

10-1: We believe that the resources information presently included in the RMP-EIS is adequate for the level of management decisions being made in this plan. Additional in-depth information on unique or limited natural resources would be included as needed in any site-specific environmental analyses of management actions subsequent to or resulting from this plan.

10-2: We agree. Details of enforcement will be worked out in activity plans for implementing the RMP.

10-3: The site-specific details for managing priority wildlife habitat areas established in the RMP will be addressed in cooperatively prepared habitat management plans (HMPs). Whereas the RMP establishes general land use allocations and broad management objectives, HMPs identify specific habitat enhancement projects, including project specifications, timeframes for completion and budgetary requirements. Public participation and environmental impact analysis have major functions in the habitat management planning process as required by NEPA.

10-4: BLM has no management responsibility over the river channels. Most of the lands adjacent to the river are Bureau of Reclamation withdrawn lands on which BLM has joint management responsibility.

10-5: The riparian acreage identified for management as priority wildlife habitat under the *Preferred Alternative* has been revised to reflect the Cocopah land transfer. The decision to transfer federal lands along the Colorado River to the Cocopah Tribe was made by Congress after the draft RMP-EIS was published.

10-6: BLM considered four factors in reviewing each of the 15 areas studied for designation as Special Management Areas in the RMP:

1) the significance of natural or cultural features in the area

2) the existence of or potential for conflicting uses

3) public visibility and opinion concerning the area

4) the degree to which routine management under the general multiple use guidelines in applicable laws and regulations would protect the resources in these areas.

On the basis of this review, BLM concluded that a number of the areas identified in the RMP lack either the resources or potential conflicts necessary to warrant special management area protection, and that management under general multiple use guidelines would provide adequate protection to these resources. The areas in the MFP that would not be designated under the *Preferred Alternative* of the RMP fall into this category.

10-7: The acquisition of riparian lands along the Colorado River was not identified through the scoping process as a planning issue. The acquisitions proposed in the RMP are intended as support for on-the-ground program management in carrying out the objectives and decisions reached for other planning issues.

10-8: See response to comment 10-2.

10-9: See response to comment 10-2.

10-10: The *Preferred Alternative* has been revised to reflect the need for more definitive ORV management guidelines as pointed out by this and other comments. In addition, a definition for "trail" has been added to the *Glossary*. "Road" is also defined in the *Glossary*.

Under the approved RMP, "existing" will refer initially to those roads and trails which are present in the district at the date the plan is adopted. As funding and manpower permit, areas of the district would be inventoried in conjunction with activity planning to ascertain "existing roads and trails" and determine whether changes in ORV designations are required. Areas with potential for significant conflict between ORV use and other resources and uses would be inventoried first. These priority areas include special management and priority wildlife habitat areas established by the RMP as well as high use recreational areas. Where adjustments to the ORV designations in the RMP are recommended as a result of activity planning, the Bureau's Resource Management Plan amendment process will be used. This process requires formal public input and a complete environmental assessment as part of decision-making.

Our intent in using the "limited to existing roads and trails" designation was to establish in the Resource Management Plan a long-term management direction toward eliminating or curtailing expansion of the district's road and trail network. Because we did not and still do not have adequate data for making decisions about which roads specifically should remain open and which should be closed, the "limited to designated roads and trails" designation is used infrequently in the RMP-EIS.

Several comments identify the potential conflict between ORV use and natural values. Commonly, the example of desert washes and the xeroriparian or desert wash plant community was used. We recognize the potential conflicts with various resources and these will be addressed in the area-specific activity plans mentioned above.

10-11: Riparian areas are already included in the areas with high wildlife values on which no wood collecting would be permitted under the *Preferred Alternative*.

11-1: "Providing for the enhancement of the visitors' recreation experience" is a goal of an MFP decision that proposed establishing a BLM Ranger Force in the Yuma District. It is not a stated goal of the RMP's recreation issue.

11-2: See response to comment 10-6.

12-1: Most of the off-road vehicle (ORV) use in Yuma District occurs on existing roads and trails. The proposed designations in the *Preferred Alternative* will have little impact on this existing use.

The 15,120 acres mentioned in the EIS have significant potential for conflicts between ORV recreation and other resource uses, including non-ORV recreation.

The designation of 640 acres as open to ORV use represents the commitment of this acreage for a single purpose. Elsewhere, the intent of the plan has been to balance the demand for ORV recreation against all other competing resource uses. The designation of most areas as open to ORV use on existing roads and trails provides for most of the current ORV use to continue unaltered in the district along with other resource uses.

52-1: The *Preferred Alternative* and *Alternative B* have been revised to include: modifications to utility corridor UC-6B and the boundary of the Cactus Plain special management area, and provisions for the transfer of 11,230 acres within the proposed new Parker townsite to the State of Arizona. Please refer to the *Special Management Areas, Land Ownership Adjustments and Rights-of-Way* issues in the *Preferred Alternative* for a full description of these changes.

54-1: The *Preferred Alternative* has been revised.

64-1: *Appendix E* includes species that are listed as "Threatened," "Endangered" or "Rare" by the federal government or the states of Arizona or California. These species are subject to protective measures described in *Management Guidance Common to All Alternatives* (Chapter 2).

Other terms in the RMP such as "key," "sensitive" and "priority" wildlife are used interchangeably to describe species that are indicators of priority wildlife habitat within the Yuma District. Priority, sensitive, threatened and endangered wildlife species are defined in the *Glossary* under the term "Species."

64-2: Table S-2 has been revised to indicate that other T&E species in the Yuma District would also benefit from designation and management of priority wildlife habitat areas.

64-3: A "No*" in Table 2-1 indicates that while an area would not be formally designated, special management prescriptions would be applied in order to protect natural values (*see footnote to Table 2-1).

64-4: The "natural values" listed in Table 2-1 represent unique natural features that characterize areas proposed for special management area protection (see Chapter 3, *Unique Natural Areas and Features*, for a detailed description of these areas). While threatened and endangered species may also be present in these areas (and may benefit from special management area protection), they are not a primary reason for the SMA proposals.

64-5: The Dome Rock Mountains migration route would be included in priority wildlife habitat under all alternatives except B and C. Protective measures that may be needed for its management as a priority wildlife habitat area would be developed in a site-specific activity plan for implementation of the RMP.

64-6: The headings for *Alternative D* in Table 2-12 have been revised to read "Resource Protection." Please note that the table number has been changed to 2-11 in the final EIS.

64-7: Wilderness designations would provide incidental protection for desert tortoise habitat in the Yuma District. However, such designations are not intended to specifically protect the desert tortoise.

As indicated in *Management Guidance Common to All Alternatives* (Chapter 2), BLM will respect state protection for the desert tortoise by consulting with the Arizona Game and Fish Department and California Department of Fish and Game before implementing any projects that may affect this species. This guidance will apply to all areas of desert tortoise habitat within the district.

64-8: The correct acreage for the proposed Gibraltar Mountain SMA is 25,260 acres. This acreage includes all of the 7,870-acre Gibraltar Mountain WSA. The RMP-EIS has been revised to show the correct acreage figure.

64-9: The terms irreversible and irretrievable as used in the explanation of the duration of resource commitments are required by the Council on Environmental Quality regulations for implementing NEPA (see Section 1502.16). The distinction between the two terms is defined in the EIS (see *Irreversible and Irretrievable Commitment of Resources,* Chapter 4).

64-10: Areas 3 and 9 in Table 4-31 (4-27 in the final EIS) refer to areas proposed for disposal under the *Land Ownership Adjustments* issue in the *Preferred Alternative* (see Map 9). Table 2-8 in the draft summarized wilderness study area recommendations for each of the RMP alternatives and did not include or affect Areas 3 and 9.

Please note that Area 9 has been deleted from the list of areas that would be available for disposal under the *Preferred Alternative* in the final RMP-EIS. In addition, Table 2-8 (Wilderness Alternatives) has been deleted in this final EIS because of BLM's decision to defer the wilderness issue until a separate environmental document is prepared in 1986.

64-11: "No" under the column heading Irretrievable in Table 4-31 (Table 4-27 in the final EIS) means that the resource commitment could be recovered or replaced if desired.

65-1: Under the *Preferred Alternative*, BLM could authorize expansion of recreation areas on federal lands along the Colorado River in cases where there is demonstrated feasibility and need (see *Issue 6: Recreation - General*). Whether through a Recreation & Public Purpose, commercial or other lease, such authorizations would be dependent upon compatibility with other resource management objectives in this RMP.

68-1: See response to comment 52-1.

95-1: Stipulations on the length of permit for races on the Parker 400 course will be addressed in the specific activity plan that would be developed for the course following approval of the RMP.

96-1: BLM has revised the *Preferred Alternative* and *Alternative C* to include provisions for designation of a communications site at Mohawk Pass.

146-1: Long-term winter visitors do pay a $25 permit fee which authorizes camping for up to 8 months. However, they are allowed to camp only in designated long-term visitor areas (LTVAs) in the district.

Length of stay restrictions for concessions cannot be compared to those for LTVAs. Concessions offer a wide range of recreation facilities in response to year-round recreational demands. A long-term stay of 8 months on concessions would result in fewer people having access to use of these high recreational demand, riverfront lands. Long-term visitor areas, on the other hand, provide only minimal recreational facilities on open desert lands to a relatively homogeneous group of seasonal visitors. With the exception of this winter visitor use, the lands in PLTVAs are not in high recreational demand.

153-1: See response to comment 52-1.

154-1: See response to comment 52-1.

156-1: None of the proposed management actions in the Yuma District RMP-EIS would affect maintenance of Palo Verde Irrigation District canals and drains.

156-2: As a result of this comment, the base map from which Maps 2 through 5 were prepared will be revised to show "Palo Verde Dam" instead of "Palo Verde Weir." However, this change is not significant enough to warrant the expenditures that would be required to revise the maps in this final EIS.

156-3: The notation of "Palo Verde Dam" on Map 2-10 and Maps 6, 7, 8 and 9 is not considered necessary.

157-1: The *Preferred Alternative* has been revised to include Milpitas Wash (4,760 acres) among the areas that would be managed under special prescriptions to protect their natural values.

157-2: The RMP-EIS is not intended as an ORV user guide. Following completion of the RMP, information and regulatory procedures for implementing the ORV designations established in the RMP will be developed in site-specific activity plans.

157-3: The Yuma District presently does and will continue to work closely with the California Department of Fish and Game to identify, protect and develop key wildlife habitat areas on BLM-administered lands for deer as well as other wildlife species. Within funding and manpower constraints, BLM works with all relevant agencies, organizations and individuals to identify, manage and protect critical areas for deer as well as other wildlife.

173-1: As a result of this comment and numerous meetings with state and local representatives, the *Preferred Alternative* and *Alternative B* have been revised to include provisions for transferring the Pittsburg Point area to the State of Arizona and Lake Havasu City.

174-1: Because it is located within the river floodplain, this parcel is designated in the RMP for retention in federal ownership and is therefore not available for public sale.

187-1: We do not foresee any conflicts between RMP decisions and the 700-foot wide cleared floodway. In addition, BLM will honor all aspects of water treaties between Mexico and the United States in implementing RMP decisions. The *Floodplain Coordination* section of *Management Guidance Common to All Alternatives* (Chapter 2) has been revised to include specific provisions for floodplain coordination with the International Boundary and Water Commission.

188-1: See response to comment 52-1.

192-1: Under the *Preferred Alternative*, wildlife habitat would be a priority consideration on a total of 247,740 acres. This total includes 23,100 acres in riparian areas along the Colorado, Bill Williams and Gila Rivers. It also includes 216,960 acres in bighorn sheep yearlong use areas and 7,680 acres in one bighorn sheep migration corridor. These areas would all be referred to as priority wildlife habitat and managed in accordance with the guidelines described in the *Preferred Alternative* for the *Wildlife Habitat* issue.

Please note that the acreage cited here for riparian habitat is less than the acreage that appeared in the draft due to changes that have been made to the *Preferred Alternative.*

192-2: The projected impacts on wildlife from grazing management alternatives are described in Chapter 4.

Few livestock are grazed in riparian areas in the Yuma District. Most of the allotments along the Colorado and Bill Williams Rivers are classified as ee ephemeral and are therefore used by livestock infrequently and for only short

periods at a time. There are only two perennial-ephemeral allotments bordering the Colorado River in the district. BLM does not plan to fence livestock off from riparian vegetation in either of these allotments. In the Ganado allotment, the area along the river is highly developed and receives virtually no grazing use. The second allotment (Bishop) has generally received only light grazing use in past years and grazing use in river riparian areas has not been a problem.

192–3: Revegetation of native trees, including the cottonwood/willow/mesquite community along the lower Colorado River on BLM-administered lands, is a top habitat management priority of the Yuma District's wildlife program. Revegetation activities are carried out within the funding and manpower limitations placed upon BLM. The specific details of revegetation projects are addressed in habitat management plans (HMPs).

192–4: The yellow-billed cuckoo is threatened by loss of its native habitat—the cottonwood/willow/mesquite association—along the lower Colorado River. Protecting the remainder and reestablishing this habitat-type through revegetation projects has been a Yuma District wildlife program priority for a number of years. The *Preferred Alternative* would extend this program priority status further by designating all remaining riparian habitat along the Colorado River as priority wildlife habitat area. In addition, present recreation use areas along the Colorado River would be managed for maintenance of wildlife habitat as well as for recreation. The district's current habitat management plans (HMPs) focus on enhancement of cottonwood/willow/mesquite habitat as a primary objective. The Resource Management Plan will provide the basis for updating and developing new HMPs.

192–5: Cattle do not normally graze yearlong on the allotments in the district. While the grazing permits for the Nine-Mile and Ganado allotments are yearlong, pastures in these allotments are rested through rotation of grazing use. Little use is made on the Muse allotment due to water developments being in disrepair. In addition, the ephemeral allotments are grazed only when annuals are present and there is potential for a sufficient ephemeral forage crop. Wildlife and other resource values are given consideration when making the decision to authorize ephemeral grazing (see also response to comment 192–8).

192–6: The Mule Deer section in Chapter 3 has been revised to reflect the competition that can occur between livestock and deer, particularly in riparian drainage and wash areas where both tend to concentrate. However, we do not believe that the competition or impacts would be significant. Both deer and livestock occupy a large area in such a low density that there is sufficient forage and space to distribute the competition to such a degree that it is minimal. This applies to most other wildlife species as well. The level of use by both wildlife and livestock is so low that it does not have a significant impact on wildlife, livestock or the riparian vegetation.

192–7: The statement on supplemental feeding has been deleted from the *Preferred Alternative* for grazing management.

192–8: There is not a "minimum pounds of forage per acre" that must exist before grazing is authorized on ephemeral allotments. However, BLM takes wildlife requirements into consideration and has discretion on whether to authorize grazing or not. Forage is reserved for wildlife in accordance with the Lower Gila Environmental Analysis Record for Range Management prepared by BLM in 1974.

195–1: While eight sites were identified for designation as multi-user communication sites in common, the *Preferred Alternative* would permit BLM to authorize placement of communication facilities on public lands outside of the designated sites when there is a legitimate need to do so. The eight sites proposed for designation in the draft RMP-EIS were identified on the basis of input from the communications industry as described in Table 5–1. A ninth communication site at Mohawk Pass has been added to the proposed plan as a result of public comment on the draft RMP-EIS.

As indicated in the *General Lands Program* section of *Management Guidance Common to All Alternatives* (Chapter 2), all applications for communication site

authorizations would be handled on a case-by-case basis under criteria and guidelines in federal regulations (43 CFR 2800) and Bureau Manuals 2800 and 2860.

195-2: As used in the RMP, the term "communication site" refers to designated multi-user sites to be utilized by all entities requiring communication facilities within the particular service zone. Designated communication sites typically have constructed access roads and a number of separate communication facilities. All other communication sites, including microwave reflector and helicopter drop station sites, are considered individual or single-user sites.

As stated in *Management Guidance Common to All Alternatives* (Chapter 2), each application to locate a communications facility on a non-designated site will be reviewed through procedures established in federal regulations 43 CFR 2800 and will include an environmental impact analysis as part of the decision process. Proposed facilities will be located in designated communication sites whenever technically possible in order to avoid a proliferation of sites and facilities on mountaintops.

199-1: The only specifically stated constraints on recreation concession expansion under *Alternative B* are those required for floodplain management. However, site-specific impacts from the expansion of concession and lease areas would be assessed and mitigated in accordance with NEPA using an EA or EIS process prior to approval by BLM.

199-2: This comment actually refers to Table S-2: Summary of Impacts by Alternative. The same table appears in Chapter 2 (Table 2-12 in the draft and 2-11 in the final EIS). As the full title states, these tables are only a summary of the impacts described in Chapter 4. Refer to Chapter 4 for a complete discussion of the impacts from *Alternative B* on recreational resources and opportunities. The discussion in Chapter 4 is self-explanatory.

200-1: See response to comment 52-1.

202-1: Mineral exploration and development in special management areas and priority wildlife areas would be subject only to the surface management regulations described for the *Energy and Minerals Program* in *Management Guidance Common to All Alternatives* (Chapter 2). These regulations are applicable to all public lands except those specifically withdrawn from mineral entry; they would not preclude or prohibit mining, but would provide for the development of mitigating measures to minimize potential impacts and prevent unnecessary and undue degradation. The regulations would be applied to individual mining operations on a case-by-case basis through review of notices of intent and mining plans of operation. The only additional restriction that would be placed on mining activities in these areas is the prohibition of sand and gravel permits.

202-2: See response to comment 202-1.

202-3: See response to comment 202-1.

202-4: See response to comment 202-1.

202-5: See response to comment 202-1.

204-1: The percent of land acquisitions for wilderness versus the percent for grazing is not a fair measure of whether *Alternative D* is balanced. The titles for alternatives relate to the broader scope of economic uses versus protection and preservation of resources as applied to the seven planning issues simultaneously.

The acquisitions proposed in each alternative are in support of resource management decisions for the other six issues in the alternative and are not ends in themselves.

The *Taylor Grazing Act of 1934* and the *Federal Land Policy and Management Act of 1976* have established grazing as one of many valid public land uses.

205-1: See response to comment 52-1.

207-1: "Apparent trend in rangeland condition" was determined by a one-time inventory. At present, this is the most accurate information we have. In the future this information will be supplemented by rangeland monitoring studies, and management practices will be adjusted as a result of monitoring to meet the planning objectives.

209-1: Under the *Preferred Alternative*, BLM would have the opportunity to extend the terms of concession leases (see *Management of Concessions and Leases* in the *Preferred Alternative*, Chapter 2).

209-2: The recreation concession franchise fees and the formula for construction reimbursement are administrative matters outside the scope of the RMP and are therefore not addressed in this plan.

Adequate guidance for fee decisions and application of construction reimbursement formulas already exist in the present concession contracts, Federal regulations and Bureau-wide policy guidelines presently being developed for concessions management. These guidelines provide for individual fee negotiations between the BLM and the concessionaire. Factors related to these negotiations include capital investment, term of lease/contract, required services and facilities, contribution of BLM services and other matters affecting the profitability of the concession and fair market value.

210-1: The RMP-EIS references include Geology, Energy and Mineral (GEM) assessments prepared for the area. These assessments include extensive data and literature references used to determine the mineral potential for these areas. Mineral resource survey reports prepared by the

USGS and Bureau of Mines are also referenced and were used to determine the mineral potential for several WSAs. The Plan and EIS for the California Desert Conservation Area is referenced and includes references to minerals information and literature used for the evaluation of those areas in California. Numerous other references on mineral and energy resources are cited in the text and listed among *References* in the EIS.

210-2: A discussion of the mineral resource potential classification used in the RMP-EIS has been added to Chapter 3, *Mineral and Energy Resources.*

210-3: The reference to uranium in Table 4-9 of the draft has been deleted. Please also note that Table 4-9 itself has been deleted from the final because of our decision to defer the wilderness issue to a separate document to be prepared in 1986.

210-4: The impacts on mineral and energy resources from rights-of-way and utility corridor alternatives is not significant. Lands open to mineral entry are available for mineral exploration and the development of appropriate access, regardless of whether utility corridors are designated. The discussion in the EIS has been revised.

210-5: An analysis of the mineral potential on lands proposed for acquisition would not affect the management decisions made for the *Land Ownership Adjustment* issue in this RMP. All land acquisitions proposed in the RMP are for the benefit of federal programs covered by the other planning issues. Since mineral development is not a planning issue, the inclusion of a comprehensive evaluation of the mineral potential of proposed land acquisitions is not considered necessary.

210-6: Special Management Areas (SMAs) are not all closed to mineral entry. Many of the alternatives provide for mineral leasing and entry under the mining laws in SMAs. Impacts on mineral and energy resources from those individual SMAs that are closed to mineral entry under the various alternatives are discussed in Chapter 4. For example, the *Preferred Alternative* would withdraw only the Big Maria ACEC from mineral entry and leasing. The impact on mineral and energy resources from this specific withdrawal is discussed in Chapter 4.

The *Mineral and Energy Resources* section in Chapter 3 and *Impacts on Mineral and Energy Resources* from *Alternative E* in Chapter 4 have been revised to reflect mineral values in SMAs.

210-7: A discussion of the mineral resource potential classification used in the RMP-EIS has been added to the *Mineral and Energy Resources* section in Chapter 3. This discussion provides the rationale and basis for the evaluation of mineral potential of the WSAs and some SMAs. The mineral resource data and information used to determine the mineral potential for a specific WSA or SMA is available in the GEM reports and USGS and Bureau of Mines reports for these areas. The only SMA that is withdrawn from mineral entry in the *Preferred Alternative* is the Big Maria ACEC.

210-8: See response to comment 210-6.

210-9: Lands within the proposed Big Marias ACEC are presently withdrawn from mineral entry for Bureau of Reclamation purposes. Since this withdrawal could be revoked if the lands are no longer needed for Bureau of Reclamation purposes, a second withdrawal to specifically protect cultural resources in the area is included as a contingency in the *Preferred Alternative.*

An assessment of the mineral potential of the Big Marias as well as other areas studied for special management has been added to the *Mineral and Energy Resources* section in Chapter 3.

210-10: Mineral exploration and development in SMAs that are managed under special prescriptions to protect their natural values (Whipple Mountains) or are managed as priority wildlife habitat (Laguna Martinez) would be subject to the surface management regulations described for the *Energy and Minerals Program* in *Management Guidance Common to All Alternatives* (Chapter 2). These regulations are applicable to all public lands except those specifically withdrawn from mineral entry; they would not preclude or prohibit mining, but would provide for the development of mitigating measures to minimize potential impacts and prevent unnecessary and undue environmental degradation. The regulations would be applied to individual mining operations on a case-by-case basis through review of notices of intent and mining plans of operation. The only additional restriction that would be placed on mining activities in these areas is the prohibition of sand and gravel permits.

210-11: See response to comment 210-10.

210-12: See response to comment 210-3.

210-13: Locatable mineral exploration and development in Special Management Areas (SMAs) designated under *Alternative D* would be administered in accordance with surface management regulations contained in 43 CFR 3809. These regulations would not preclude or prohibit mining, but would provide for the development of mitigating measures to minimize potential impacts and prevent unnecessary and undue environmental degradation.

210-14: See response to comment 210-6.

212-1: In implementing its RMP decisions, BLM will comply with U.S. Army Corps of Engineers' permitting requirements and honor all water treaties between Mexico and the United States. Cases where compliance with Corps

of Engineers, International Boundary and Water Commission, or other agency requirements is needed will be identified in activity plans for implementing the RMP and these agencies will be consulted at that time.

212-2: Proceeds from the sale of Federal lands within Bureau of Reclamation project boundaries revert to the Reclamation fund and are credited to construction costs of the project. Boundaries for the Valley Division of the Yuma Project have not yet been agreed upon. However, all actions proposed in the RMP will be implemented in a manner that is consistent with the procedural guidelines of applicable laws, executive orders and national policy.

213-1: With the exception of disposal areas identified in the plan, all BLM-administered lands will be retained in federal ownership under the *Preferred Alternative.* The retained lands include all recreation use areas except Pittsburgh Point. Accordingly, all three of the parcels mentioned in this comment will be maintained in public ownership during the life of the Resource Management Plan.

Section 12 is currently leased to Mohave County under a Bureau of Reclamation Lease for recreation purposes. Section 30 is also leased to Mohave County, but under a Recreation and Public Purposes lease. The Arizona Game and Fish Department has an application pending with BLM to assume management responsibility under a lease agreement for Section 10. Either a lease or a Cooperative Management Agreement (CMA) may result. If so, the area would probably be managed for its wildlife values.

214-1: Sections 7 and 18 were erroneously included in the La Posa LTVA as shown on Map 7. We have revised Map 7 to correct this error.

214-2: Utility corridor designations that are proposed in the RMP apply only to BLM-administered lands. However, BLM recognizes that designated corridors on BLM-administered lands could impact uses on other lands. These impacts will be addressed in site-specific environmental analyses on a case-by-case basis as applications to construct transmission facilities are received. Moreover, actual construction of facilities could only be accomplished with approval of the affected landowners and managers.

It should also be noted that the *Preferred Alternative* proposes a second corridor in this vicinity — corridor UC-7 along Interstate 10 — as an alternate to UC-8.

215-1: We believe that the resources information presently included in the RMP-EIS is adequate for the level of land use and management decisions being considered and made in this plan. General indications of population status are included in the descriptions of wildlife categories and species in Chapter 3. Information on the distribution of species is described in the *Management Situation Analysis* (MSA) — a planning background or base information document available for review at the Yuma District or Havasu Resource Area Offices. (See Appendix A-1 for a description of the MSA step in the planning process.)

As stated in the *Environmental Program* section of *Management Guidance Common to All Alternatives* (Chapter 2), any site-specific actions and activity plans not specifically analyzed in this RMP-EIS would be analyzed through EAs or EISs, in accordance with NEPA regulations, prior to approval by BLM. Additional detailed information would be collected and included as needed in any site-specific environmental analyses of management actions subsequent to or resulting from this plan.

215-2: Allowable uses and specific management guidelines that would be applied under each alternative to priority wildlife habitat and special management areas are described in Chapter 2. Further site-specific details for managing these areas and sites will be developed in activity plans. BLM will comply with NEPA in developing these activity plans.

215-3: See response to comment 10-5.

215-4: Aquatic habitat management was not addressed in detail in the Resource Management Plan because it was not identified as a planning issue. The *Wildlife and Fisheries Program* section of *Management Guidance Common to All Alternatives* (Chapter 2) describes general procedures and practices that BLM applies to management of both terrestrial and aquatic habitats. As indicated in that section, wildlife habitat management activities and objectives are normally developed in cooperation and consultation with other agencies and interest groups through the cooperative habitat management planning process established under the Sikes Act (see *Glossary*).

215-5: The *Preferred Alternative* for grazing management on the Havasu Heights North and South allotments has been modified.

215-6: As a multiple-use land managing agency, it would be unreasonable to designate priority areas for all special status species in the district because: a) there are a large number of these species in the district (see *Appendix E* for list), and b) many of these species are widely scattered with few areas of concentration throughout the district. However, special status species are given priority consideration in all actions as a matter of routine procedure. Federally-listed as well as state- and other-listed wildlife species are managed as described in the *Wildlife and Fisheries Program* section of *Management Guidance Common to All Alternatives* (Chapter 2).

The site-specific details of on-the-ground management for special status species will be addressed in habitat management plans prepared cooperatively with other agencies and interest groups.

215-7: Eight areas would receive some form of special management area protection under the *Preferred Alternative*. Two of these areas would be formally designated, and the remaining six areas would be managed under special prescriptions to protect their natural values.

BLM's reasons for not including all of the areas identified for SMA designation under *Alternative A* in the *Preferred Alternative* are described in the response to comment 10-6.

215-8: There are a variety of reasons why the areas studied for special management area status in this RMP-EIS would not be formally designated or assigned special management prescriptions. The response to comment 10-6 describes these reasons.

215-9: See response to comment 10-7.

215-10: See response to comment 10-2.

215-11: Recreation planning subsequent to adoption of the RMP will be accomplished primarily through a series of activity plans. BLM must comply with NEPA and federal regulations in developing activity plans. These regulations require analysis of the environmental impacts and public review of the environmental documentation and proposed decisions.

215-12: See response to comment 10-10.

215-13: The mitigating measures described in the Final Environmental Assessment and Environmental Impact Report for the 1985 Parker 400 race are applied to the one event held each year on the course. This document was finalized on January 22, 1985, and is available for review at the Havasu Resource Area and Yuma District Offices. In addition, as stated in the *Preferred Alternative,* when more than one annual event is proposed for the Parker course, an environmental assessment (EA) would be developed to determine the number of events that would be authorized. The *Preferred Alternative* also prescribes a course management plan and monitoring of impacts. Where monitoring identifies significant adverse impacts, a new or supplemental EA would be prepared to analyze alternative mitigating measures.

215-14: BLM considers the level of analysis for impacts on wildlife habitat to be adequate for selecting a *Preferred Alternative* from among the RMP alternatives.

The impact projections in the RMP-EIS are general because the decisions are general. The RMP provides general management objectives, guidelines and land use allocations. The site-specific details of management are developed through activity plans as mentioned in Chapter 1 of the RMP-EIS. The site-specific impacts from these activity plans and other actions not specifically projected in the RMP would be analyzed and documented on a case-by-case basis as described in the *Environmental Program* section of *Management Guidance Common to All Alternatives* (Chapter 2). For this reason, we do not consider a "worst case" analysis to be necessary at this time. BLM would consult with the U.S. Fish and Wildlife Service and other agencies as part of the site-specific analyses to determine appropriate mitigating measures for wildlife habitat.

215-15: A "Monitoring" section has been added to Chapter 2 in the final RMP-EIS.

215-16: *Appendix E* has been revised.

216-1: The *Preferred Alternative* has been revised to clarify exceptions to the seasonal closure of roads traversing bighorn sheep lambing grounds.

216-2: The temporary closure of priority wildlife areas during critical seasons, such as lambing in the case of desert bighorn sheep, is a standard part of terms and conditions of any right-of-way construction grant issued by BLM. The temporary closure of areas during lambing season has been a Stipulation on construction of facilities in corridors 2, 4, 5 and 8 for the past five years and will continue to be enforced as part of the RMP recommendations.

218-1: The corridors proposed for designation in the Draft RMP-EIS were identified on the basis of input from the utilities industry as described in Table 5-1.

In addition, three criteria were used to determine potential corridors to be analyzed in the RMP-EIS. These were:

1) the corridor was proposed by either the Western Regional Corridor Study or a utility company

2) adequate public lands were available to accommodate a corridor along the proposed alignment

3) the potential corridor contained existing facilities or definitely planned future facilities.

The existence of a transmission line was not considered sufficient justification alone for designating a utility corridor.

It should also be noted that with the exception of wilderness study, special management and priority wildlife habitat areas, other locations for transmission lines have not been precluded by the proposed RMP. The *Preferred Alternative* would permit BLM to authorize placement of utility lines on public lands outside of designated corridors when there is a legitimate need to do so.

218-2: Proposed corridors have been limited to one-mile in width in most cases for one or both of the following reasons:

1) lack of adequate public lands to accommodate corridors of greater than one mile in width, and

2) the presence of significant natural or cultural values.

Additionally, we believe the one-mile wide corridors are sufficient to accommodate needs projected through 1995 by the utility industry.

218-3: See response to comment 195-1.

219-1: See response to comment 10-10.

219-2: A full discussion on how grazing will be administered and monitored can be found in Chapter 2 under *Management Guidance Common to All Alternatives.*

219-3: Special status species are given priority consideration in all actions as a matter of routine procedure. Federally-listed as well as state- and other-listed wildlife species are managed as described in the *Wildlife and Fisheries Program* section of *Management Guidance Common to All Alternatives* (Chapter 2). The site-specific detail of on-the-ground management for special status species will be addressed in habitat management plans prepared cooperatively with other agencies and interest groups.

220-1: The Southwest Powerlink 500 kV transmission line is shown as UC-9 on Map 8. Also, Map 6, *Land Status*, has been changed to reflect the lands mentioned in this comment.

221-1: See response to comment 10-10.

228-1: The language used in this section of *Management Guidance Common to All Alternatives* is drawn directly from the 1975 Management Framework Plans (MFPs). The section presents specific management guidance from the MFPs that would continue to be applied to public land management under the RMP. Despite this language, BLM will prevent to its best ability the introduction of exotic species on BLM-administered lands.

228-2: The *Preferred Alternative* does not authorize unrestricted or unregulated mining activity anywhere in the district. All mining operations approved by BLM must comply with federal and state laws and regulations pertaining to surface reclamation and environmental degradation. Specifically, the regulatory standards established in federal regulation 43 CFR 3800 would continue to be applied to all mining activities, as stated in the *Energy and Minerals Program* section of *Management Guidance Common to All Alternatives* (Chapter 2).

228-3: Details of enforcement will be developed in activity plans for implementing the RMP.

228-4: See response to comment 10-10.

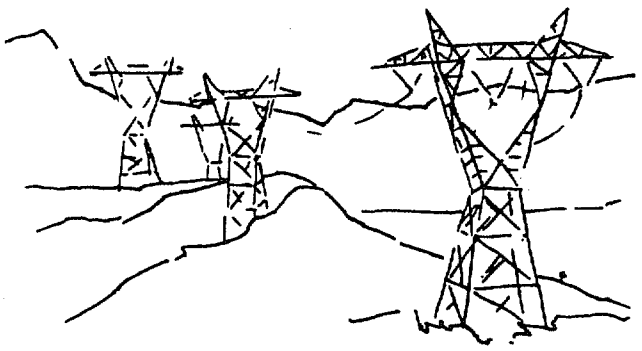
228-5: Other species and habitats do receive BLM's attention. Concern for state-listed species has been a dominant part of our wildlife habitat program in the past and will continue to be so in the future. As stated in the *Wildlife and Fisheries Program* section in *Management Guidance Common to All Alternatives*, the Yuma District consults with state agencies to identify appropriate mitigating measures as a standard procedure in evaluating proposed actions that may affect state-listed wildlife species.

The species mentioned in this comment, as well as all other specially-listed species, are routinely considered by BLM in evaluating and making decisions on proposed actions.

228-6: The text and *Appendix E* have been revised to reflect the correct status of this species.

228-7: The Yuma District is actively seeking to restore and enhance Yuma clapper rail habitat. BLM participates as a member on the interagency Yuma Clapper Rail Recovery Team. A recovery plan has been developed by this group to enhance clapper rail habitat and numbers. In addition, the *Preferred Alternative* proposes special management and priority wildlife habitat areas that would benefit the clapper rail. For example, all remaining riparian habitats would be designated as priority wildlife habitat area regardless of present condition.

228-8: Mineral and energy development was not identified as a planning issue in the RMP scoping process. The discussion of environmental consequences for each alternative focuses only on those impacts that would arise from the decisions on the planning issues. Mineral activity and development are managed on a day-to-day or site-specific basis. The management guidelines for mineral and energy resources are summarized in Chapter 2 under *Management Guidance Common to All Alternatives.* Locatable mineral exploration and development is administered in accordance with surface management regulations contained in 43 CFR 3802 and 3809. These regulations provide for the review of individual mining operations to prevent unnecessary and undue environmental degradation, and the development of mitigating measures to minimize potential impacts. These procedures will minimize the impacts to wildlife in the priority habitat areas.



228–9: Mitigating measures for impacts on wildlife from actions not specifically projected in the RMP will be developed by BLM on a site-specific basis as part of the environmental process described in the *Environmental Program* section of *Management Guidance Common to All Alternatives* (Chapter 2).

228–10: *Appendix E* has been revised. The source for *Appendix F* is Yuma District files. The footnote to the table itself has been revised to add this clarification.

228–11: Impacts from ephemeral grazing on wildlife are virtually non-existent since little ephemeral grazing actually occurs in the district, and competition between livestock and wildlife species for ephemeral forage occurs infrequently and only on a site-specific as opposed to habitat-wide basis.

Desert tortoises are scattered in low density numbers throughout the northern portions of the district. Areas of concentration are not known to exist. Accordingly, it is impractical to manage the widely scattered low numbers of this species through ephemeral forage allocations.

Trends cannot be determined for ephemeral species because they are short-lived, dependent upon annual climatic conditions and may not appear every year.

228–12: By proposing to put this allotment in the maintain category, BLM is indicating that the present grazing management (non-use) is causing no serious resource conflicts. If the grazing practices change on this allotment and resource conflicts become apparent, the management category would be changed.

228–13: The Cactus Plain area would be managed in a manner that would ensure maintenance of the area's existing unique plant community and the stability of the dune ecosystem, as stated in the *Preferred Alternative*. The specific strategies and techniques for accomplishing this will be developed in the Allotment Management Plans for the two allotments.

228–14: The allotment categorization (M-I-C) establishes priorities for distributing management funds and personnel. The fact that Bishop allotment is in the "C" category rather than "I" indicates it has fewer resource conflicts than "I" category allotments. Until funds and personnel are available, "C" category allotments will be managed to prevent resource deterioration as indicated in the *Allotment Categorization* section of *Management Guidance Common to All Alternatives* (Chapter 2).

228–15: Unique natural areas and features in the Yuma District were identified from a variety of sources, including district files, studies and reports prepared by other agencies or organizations, and contacts with state park systems and affiliated natural heritage organizations in Arizona and California. Many of these areas, including Crossman Peak, Gibraltar Mountain, the Big Marias and Muggins Mountains were not identified in the Yuma District MFPs or supporting documents.

228–16: There are no Yuma clapper rails in the Aubrey Hills area to our knowledge. Numerous surveys of bird populations have failed to locate any clapper rails along this length of the river.

228–17: The description of the Laguna-Martinez area (see *Unique Natural Areas*, Chapter 3) has been revised to include information on the yellow-billed cuckoo.

228–18: On the basis of the factors of evaluation described in the response to comment 10–6 and additional information, BLM has concluded that the Yuma Desert should not receive special management area consideration under the *Preferred Alternative*.

The area is on lands withdrawn by the Bureau of Reclamation to form the "five mile zone" along the border with Mexico. This zone is intended for development of water wells to pump Colorado River groundwater back into the river in order to meet the United States water commitment to Mexico (1977 Mexican Treaty). Furthermore, parts of this area have been proposed for use as a sanitary landfill site and the new Yuma County Prison site.

228–19: Management policies or prescriptions for special management areas under *Alternative C* are described in the *Special Management Areas* issue for *Alternative C*.

The *Preferred Alternative* incorporates management actions from the entire range of alternatives, depending on the need for a specific issue; it does not necessarily provide a perfect balance between resource development and resource protection for each individual issue or subissue, nor is it a balance between *Alternatives C* and *D*.

228–20: On the basis of the factors of evaluation described in the response to comment 10–6, BLM does not consider the natural values in the Gila Mountains to be significant enough to warrant specific management prescriptions. Management under general multiple use guidelines is considered sufficient to adequately protect resources in the area.

228–21: We assume that this comment refers to the five special management areas that would not be formally designated in the *Preferred Alternative* but would be managed under special prescriptions to protect their natural values. The management prescriptions for these areas are described in the *Unique Natural Areas and Features* section of the *Preferred Alternative*. More detailed, site-specific management actions, objectives and strategies would be determined through the development of activity plans for managing each individual SMA. These

activity plans would be developed in accordance with the public participation and environmental review requirements of NEPA.

228-22: All BLM-administered riparian lands remaining along the three rivers in the Yuma District would be managed as priority wildlife habitat under the *Preferred Alternative.*

228-23: Threatened and endangered (T&E) plants are protected under the Endangered Species Act. The section on T&E plants has been revised to further explain management procedures that are required and applied by BLM when actions are proposed which could affect T&E plant species.

228-24: With the exception of portions of UC-6B, UC-7, UC-10, UC-11 and UC-12, all of the utility corridors identified in the RMP follow existing utility rights-of-way. Existing utility rights-of-way and expected demand for utility and communication sites in the next five to twenty years are discussed in detail in the Yuma District *Management Situation Analysis,* a planning background document that is available for review at the Yuma District and Havasu Resource Area Offices.

Corridors that do not follow existing utility rights-of-way are proposed for designation only in instances where such routings are needed for consistency with other RMP management objectives.

228-25: BLM cannot accurately predict the need for additional recreation lands over the life of the plan. Consequently, such needs will be addressed on a case-by-case basis. Site-specific impacts from the expansion of recreation areas to adjacent or new public lands would be assessed and mitigated in accordance with NEPA using an EA or EIS process prior to approval by BLM. Furthermore, any future recreation expansion would be required to be consistent with resource management objectives contained in the RMP for floodplain, wildlife habitat and other values.

228-26: See response to comment 10-10.

228-27: Certain recreation facilities and uses, such as day-use recreation areas and overnight camping in some places, would not conflict with floodplain management objectives. Through proper design, location, and management, these facilities and uses could occur in the floodplain without substantially disrupting wildlife habitat or other natural and beneficial floodplain values.

Riparian areas and wildlife habitat would not benefit from management actions under *Alternative B,* as none of the restoration projects associated with priority wildlife habitat designations would be implemented on these lands. However, the absence of benefit from such projects is not considered inconsistent with BLM Floodplain Manual 7221.

228-28: BLM cannot predict the need for new concessions and leases or the expansion of existing concessions and leases over the life of the RMP. Consequently, such actions would be addressed on a case-by-case basis under the *Preferred Alternative.* As indicated in the *Environmental Program* section of *Management Guidance Common to All Alternatives* (Chapter 2), the impacts from these actions would be analyzed through site-specific EAs or EISs in accordance with NEPA regulations before approval by BLM. The actions would also be constrained by other management objectives established in the RMP.

228-29: User profiles, preferences and benefit-cost analyses are commonly applied to recreation market and feasibility analyses. Analysis of these factors will indicate whether expansion would: a) help to satisfy existing unmet demand and b) be economically viable. These, together with protection of wildlife and riparian values, are the criteria BLM would use in deciding whether to authorize proposals for expansion.

228-30: Floodplain delineation is discussed under the *Floodplain Protection Program* section in *Management Guidance Common to All Alternatives* (Chapter 2).

228-31: BLM does not consider long-term camping to be a legitimate use of utility rights-of-way on public lands. Actual displacement depends on the width of the right-of-way and the type of facilities constructed. In most cases, utility use of a corridor would remove much less than the 1,900 acres mentioned.

228-32: See response to comment 10-2.

228-33: See response to comment 204-1.

228-34: We have no intention of disposing of lands within the river floodplains. The *Disposals* section of *Management Guidance Common to All Alternatives* (Chapter 2) has been changed to include "riparian habitat" as a condition which would preclude transferring lands within a disposal area from federal ownership. Instances where riparian floodplains may inadvertently fall within disposal areas will be identified during the site-specific analyses required for disposals; these lands would subsequently be excluded from disposal.

228-35: The RMP does not specify which non-federal lands would be acquired in exchange for which federal lands. Rather it simply identifies those federal lands that will be available for disposal and those non-federal lands that BLM would like to acquire in order to enhance management of federal programs on-the-ground. The specific details of land exchanges will be subsequently identified on a case-by-case basis.

Please note also that Disposal Area 9 has been dropped from the list of public land areas that would be available for disposal under the *Preferred Alternative.*

228–36: Lands acquired for wilderness would be closed to mineral entry, resulting in a net loss of acreage that would be open to mineral entry under the General Mining Law of 1872. This net loss is illustrated in Table 4–3. In the case of *Alternative D* in the draft EIS, for example, only 39,940 acres out of 50,120 acres that are acquired would be open to mineral entry while the remaining 10,180 acres (which were to be acquired for wilderness) would be closed to mineral entry.

Please note that the wilderness issue has been deferred to a separate environmental document to be prepared in 1986. There are no wilderness recommendations in this final RMP-EIS. Accordingly, Table 4–3 has been deleted in the final.

228–37: "Area 3" refers to Disposal Area 3 as indicated on Map 9. The text has been revised to clarify this.

228–38: This comment is correct. The *Preferred Alternative* provides for exceptions to the seasonal road closures in lambing grounds for certain uses and situations. Development of active mining claims is included among these possible exceptions. However, the seasonal road closures would affect minerals exploration by eliminating access to and therefore exploration of those areas that are outside of active mining claims.

228–39: Mineral and energy development was not identified as a planning issue in the RMP scoping process. The discussion of environmental consequences for each alternative focuses only on those impacts that would arise from the decisions on the planning issues. Consequently, impacts from mineral and energy development in the Yuma District were not addressed in the RMP.

Impacts from mineral and energy development, mitigation measures and surface reclamation requirements will continue to be addressed for individual mining operations on a case-by-case basis in accordance with existing law and federal regulations as described in the *Energy and Minerals Program* section of *Management Guidance Common to All Alternatives* (Chapter 2).

228–40: See response to comment 215–13.

228–41: Under the *Preferred Alternative*, impacts on wildlife from grazing on the Nine-Mile allotment would be minor. Since these impacts are not considered significant, specific mitigating measures are not necessary.

228–42: See response to comment 215–15.

229–1: The riparian lands identified under the *Preferred Alternative* for management as priority wildlife habitat will not affect or be affected by the channel enhancement project on the Gila River.

230–1: The *Community Expansion* provisions in *Management Guidance Common to All Alternatives* (Chapter 2) would allow BLM to make federal lands within the Yuma Crossing Park boundaries available for park and recreation purposes through Recreation and Public Purpose leases.

262–1: Public participation opportunities that have been offered to the Colorado River Indian Tribes (CRIT), as well as other interest groups and individuals, are listed in Table 5–1. Other public input opportunities have been provided to CRIT, including: a) a private meeting to scope issues for the Havasu RMP in 1982, b) a briefing meeting on the draft RMP-EIS in March 1985 and c) numerous meetings of the District Advisory Council attended by CRIT representatives.

262–2: BLM has revised the *Preferred Alternative* to include provisions for phasing out facilities at the Black Peak communication site. In addition, the utility corridor has been narrowed to less than one-mile in width as it passes Black Peak in order to avoid construction of transmission facilities on the Peak itself.

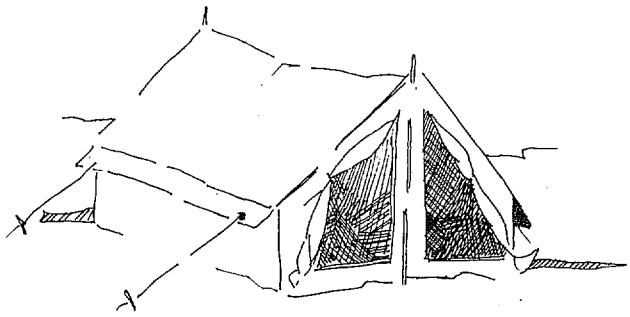
262–3: The lands mentioned in this comment were transferred in partial compensation for the overall federal land debt to the State of Arizona through the State Indemnity-Lieu Selection process. Notices of classification for transfer and requests for comments were published in the *Federal Register* in mid-July 1981 and in the *Parker Pioneer* newspaper for five consecutive weeks beginning August 6, 1981.

BLM does not foresee any actions on lands that have already been disposed of or are identified for disposal in the RMP that would substantially affect uses and environmental conditions within the Colorado River Indian Reservation or cultural resources located nearby.

None of the land disposals along the Colorado River Indian Reservation boundary that have already occurred or are identified in the RMP are related to potential mining activities.

262–4: See response to comment 262–1.

262–5: "Priority wildlife habitat areas" are those public land areas on which priority will be given to the protection, maintenance and improvement of wildlife habitat values. "Special management prescriptions" are guidelines that will be applied to special management areas, both those with formal titles such as ACEC and Outstanding Natural Area, and those without titles. "Key wildlife" is used interchangeably with "priority wildlife" in the EIS (see Priority Wildlife Species in *Glossary*).



Allowable uses and specific management guidelines that would be applied to priority wildlife habitat, cultural resource sites and special management areas are addressed in the descriptions of each of the plan alternatives for Issues 1 and 2. Further site-specific details for managing these areas and sites will be developed in activity plans. BLM will comply with NEPA in developing activity plans.

262-6: As indicated in Chapter 5, BLM has consulted and coordinated with the California Desert District, the U.S. Bureau of Reclamation and the California Department of Transportation in all phases of the RMP.

262-7: The Big Maria ACEC is confined to the southern half, or that portion of the Big Maria Cultural Resource Management Plan (CRMP) area having the highest concentration of cultural resources. While the northern half of the CRMP area contains important cultural values, they are sparsely distributed and do not justify managing the entire CRMP area as an ACEC at this time. Several smaller areas in the northern half of the CRMP area will be managed under the guidelines for cultural resource sites contained in the Resource Management Plan (see *Cultural Resources* in the *Preferred Alternative*).

Guidelines and restrictions for managing the Big Maria ACEC are described under *Natural Areas and Features* in the *Preferred Alternative.*

263-1: The *Preferred Alternative* of the RMP establishes a permanent Arizona loop of the Parker ORV race course. The existing route has been thoroughly analyzed for environmental impacts through the annual evaluation occurring prior to issuing a race permit. Analysis of alternative course alignments is beyond the scope of this Resource Management Plan. Minor adjustments to the race course can be accomplished during the annual review of race impacts and mitigating measures. A separate environmental analysis would be required to evaluate the impacts of alignment alternatives and other race management changes.

265-1: We believe that the present level of analysis contained in the RMP-EIS is adequate for making a reasoned decision, and further that an analysis of the cumulative impacts of public land withdrawals would not significantly alter the selection of the *Preferred Alternative.*

265-2: See response to comment 216-1.

265-3: See response to comment 202-1.

265-4: Table 4-1 lists major actions which have the potential to adversely affect Cultural Resources. Under the heading of Unauthorized Activities, the table lists "Mining and occupancy trespass." Under the heading of Authorized Activities is listed "Mining-related activities." To reduce the possibility for misinterpretation, "mining and occupancy trespass" has been revised to read "mining trespass and occupancy trespass."

265-5: The review of Bureau of Reclamation and other agency withdrawals is addressed in the *General Lands Program* section of *Management Guidance Common to All Alternatives* (Chapter 2).

Because the wilderness issue has been deferred to a separate environmental document to be prepared in 1986, none of the management actions under the *Preferred Alternative* would result in the withdrawal of additional acreage in the Yuma District from mineral entry. The 5,280 acre Big Marias area is presently under Bureau of Reclamation withdrawal.

265-6: See response to comment 202-1.

266-1: Area 9 has been eliminated from the lands that would be available for disposal under the *Preferred Alternative.*

268-1: Priority wildlife habitat areas proposed in the plan reflect desert bighorn sheep range because potential threats from incompatible uses would directly affect the suitability of habitat for this species and therefore affect the population or numbers of this species. Potential threats to desert tortoise habitat are site-specific in nature and would not reduce the overall suitability of habitat or diminish the population size on a large scale.

As a state- and federally-listed species, desert tortoise will be managed and protected as described under the *Wildlife and Fisheries Program* section of *Management Guidance Common to All Alternatives* (Chapter 2).

268-2: BLM does not consider a "worst case" analysis to be necessary for impacts from RMP management actions on the desert tortoise. As indicated in the *Threatened, Endangered and Sensitive Species Habitat* section of *Management Guidance Common to All Alternatives* (Chapter 2), no activities or projects that would jeopardize the continued existence of the desert tortoise or other threatened and endangered species would be allowed on BLM-administered lands. To ensure that this guidance is followed, impacts from actions not specifically projected in the RMP would be subject to site-specific environmental analyses. Site-specific analyses would include consultation with the U.S. Fish and Wildlife Service, the Arizona Game

and Fish Department and the California Department of Fish and Game on possible impacts to the desert tortoise.

268-3: Ephemeral forage is restored during periods of abundant moisture. Ephemeral species are opportunistic, growing and reproducing at any time of the year under suitable temperature and moisture conditions.

268-4: Standard stipulations for oil and gas leasing are listed in federal regulation 43 CFR 3100. There are no standard stipulations for mining plans of operation.

268-5: See response to comment 157-1.

268-6: See response to comment 10-10.

268-7: No specific adverse impacts on desert tortoise are identified in Chapter 4. Accordingly, no mitigation measures were developed. The site-specific impacts on desert tortoise from activity plans and other proposed actions subsequent to the RMP will be identified through separate environmental analyses. Appropriate mitigating measures would be developed as part of these analyses. In addition, state wildlife agencies and other interest groups and individuals, including the Desert Tortoise Council, will be consulted during preparation of these analyses.

268-8: See response to comment 215-15.

268-9: Appendix E has been revised.

269-1: Potential SMAs are characterized by significant natural, cultural or scenic resources. WSAs may include significant natural, cultural or scenic resources, but are characterized by roadlessness, naturalness and outstanding opportunities for solitude or primitive recreation. SMAs and WSAs overlap each other because these characteristics can be in both areas.

Whereas WSAs are recommended for wilderness designation primarily to protect the wilderness characteristics of roadlessness, naturalness and outstanding opportunities for solitude or primitive recreation, SMAs are intended to protect the specific natural, cultural or scenic resources for which the area is recognized. SMA characteristics can be protected without applying the rigid, restrictive guidelines applied to designated wilderness areas. See response to comment 10-6 for a description of the criteria BLM used for making decisions on potential SMAs.

269-2: Each of the special management areas designated in the Resource Management Plan is established to protect or enhance specific natural or cultural resources. The discussion on *Issue 2: Special Management Areas in the Preferred Alternative* provides a description of the general management approach for each area.

After the RMP is adopted, BLM will prepare an activity plan for each special management area. The activity plan establishes detailed and site-specific management actions, objectives and strategies. Preparation of each plan includes appropriate environmental impact analysis documentation. Factors that would be addressed in the environmental review include potential impacts to water quality, air quality, other environmental resources and appropriate mitigation.

269-3: As a standard procedure, all proposed actions with potential for resource disturbance are analyzed on a site-specific basis through an EA or EIS in accordance with the requirements of NEPA.

269-4: Acreage totals in Table 2-1 include not only those areas that would have specific designated labels such as Outstanding Natural Area or ACEC assigned to them, but also undesignated areas (indicated in the table by "No*") where special management prescriptions would be applied to protect natural values.

The footnotes to Table 2-1 have been revised to clarify acreage totals for the alternatives.

269-5: Other than those described in the *Preferred Alternative*, plans for improvements on the Ganado and Nine-Mile Allotments are not firm now, but would be addressed in individual Allotment Management Plans (AMPs). The AMPs are prepared in consultation with the allotment operator and other affected parties, and include an analysis of environmental impacts. Clarification about the timing of grazing use on perennial-ephemeral and ephemeral allotments can be found in the *Grazing Administration* section of *Management Guidance Common to All Alternatives* (Chapter 2) and in Chapter 3 under the *Rangeland Resources* section of the RMP-EIS.

269-6: Water quality was not identified through the scoping process as a planning issue. The major water resources in Yuma District are managed under the auspices of the Bureau of Reclamation for river control management. The few springs and water developments under BLM's direction are managed in accordance with habitat management plans that have been prepared for wildlife.

The impacts of decisions under the various alternatives on water quality are discussed under the *General Impacts* section of Chapter 4. The management of riparian values is also addressed in the RMP-EIS.

The potential impacts from proposed actions on water quality are assessed by BLM as a standard procedure in carrying out site-specific environmental analyses.

269-7: The 23,100 acres of riparian vegetation that would be managed as priority wildlife habitat under the *Preferred Alternative* (25,000 acres in the draft) represents all of the remaining riparian areas in the Yuma District that are administered by BLM. Since all remaining riparian areas,

including those around springs, would be protected as priority wildlife habitat, no additional mitigating measures are considered necessary.

Wilderness areas and water resources would be protected under provisions described in *Management Guidance Common to All Alternatives* (Chapter 2). No further protection through mitigating measures is considered necessary.

The *Preferred Alternative* has been revised to clarify the amount of riparian acreage in the Yuma District that would be managed as priority wildlife habitat.

269-8: Background data on air quality is contained in the Yuma District Management Situation Analysis. This planning background document is available for public review at the Yuma District and Havasu Resource Area Offices. In addition, expected impacts from RMP decisions on air quality are discussed under *General Impacts on Physical Features* in Chapter 4.

269-9: Nothing in the RMP-EIS is intended to imply an authorization for or decision to use pesticides on public lands. BLM operates under strict guidelines for usage of pesticides. Proposed pesticide applications are reviewed and evaluated on a case-by-case, site- specific basis through an EA or EIS.

271-1: Utility corridor designations proposed in the RMP do not apply to non-federal agricultural and other private lands. However, BLM recognizes that designated corridors on BLM-administered lands could impact uses on non-federal lands. These impacts will be addressed in site-specific environmental documents prepared on a case-by-case basis as applications to construct transmission facilities are received.

271-2: We believe that the impacts on wildlife projected in Chapter 4 are adequate for the level of management decisions contained in the RMP. Moreover, the species mentioned in this comment would not be adversely affected by implementation of decisions in the RMP. In fact, they would more likely benefit on balance as a result of management objectives and guidelines for priority wildlife habitat and special management areas contained in the RMP.

271-3: The *Preferred Alternative* generally provides for continuation of recreation uses already occurring on the Yuma District. Site-specific actions which would modify existing recreation uses and opportunities will be addressed in recreation activity plans. These plans require analysis of environmental impacts and public review of the possible impacts and proposed decisions. BLM will consult with Riverside County on proposed actions that might affect or be affected by uses and environmental conditions in the County at the time activity plans and associated environmental analyses are being prepared.

309-1: This comment refers to management guidelines that would be applied within priority wildlife habitat areas. Each of the alternatives for wildlife habitat management specifies whether utility access roads would be open or closed to public use. Utility roads would be closed to public access under *Alternatives C, D, E* and the *Preferred Alternative*.

309-2: ORV use of utility access roads was not identified specifically as a planning issue through the scoping process. Accordingly, the impacts from ORV use on these roads specifically are not discussed. However, the impacts from utility access road closures in priority wildlife habitat areas and ORV designations are discussed in the sections of Chapter 4 describing impacts from the wildlife habitat and recreation alternatives respectively.

311-1: See response to comment 215-1.

311-2: See response to comment 215-15.

311-3: Management restrictions and guidelines for areas of critical environmental concern, research natural areas, outstanding natural areas, natural scenic areas or other special management area designations are addressed in the descriptions of each of the plan alternatives for *Issue 2: Special Management Areas*. Further details for managing these areas will be developed in site-specific activity plans subsequent to approval of the RMP. These activity plans will be prepared in accordance with the public involvement and environmental analysis procedures required by NEPA.

311-4: The *Threatened, Endangered and Sensitive Species Habitat* section of *Management Guidance Common to All Alternatives* has been revised to include species proposed for listing.

311-5: Despite a 10-year permit, the BLM has the option of a downward or upward adjustment in livestock numbers if monitoring data indicates that the present grazing use is not meeting land use plans or management objectives. See the 43 Code of Federal Regulations (CFR) section 4130.6-3.

311-6: Rangeland monitoring intervals for the individual allotments vary depending upon range condition and potential, allotment management objectives and potential conflicts within allotments. Specific monitoring information for each allotment is in the Lower Gila Monitoring Plan which may be reviewed at the BLM Yuma or Phoenix District Offices.

311-7: Under the *Preferred Alternative*, riparian areas that are administered by BLM would be managed as priority wildlife habitat in accordance with the management guidelines and restrictions described for the Wildlife Habitat issue. Further details for managing priority wildlife habitat areas will be developed in site-specific habitat

management plans subsequent to approval of the RMP. These plans will be developed in accordance with the requirements of *NEPA* and the *Sikes Act*.

311-8: BLM does not consider the designation of priority wildlife habitat areas for all state-listed species to be reasonable because: a) there are a large number of these species in the district, and b) many of these species are widely scattered with few areas of concentration throughout the district.

Wildlife and plant species that are listed by Arizona or California as endangered, threatened or rare would already be protected by provisions indicated in the *Wildlife and Fisheries Program* section of *Management Guidance Common to All Alternatives* (Chapter 2). These provisions require BLM to consult with the Arizona Game and Fish Department and the California Department of Fish and Game before implementing any projects that may affect these species.

311-9: See response to comment 10-10.

311-10: See response to comment 215-4.

311-11: See response to comment 10-6.

311-12: The description of the Aubrey Hills area (*Unique Natural Areas*, Chapter 3) has been revised to more accurately describe the area's character and status.

311-13: Cactus Plain is proposed for special management. We believe the management prescriptions described in the *Preferred Alternative* will provide adequate protection to the area's unique natural values. In addition, a large part of the Cactus Plain area was recommended for designation as wilderness in the draft RMP-EIS. For these reasons, formal designation as an ACEC, Outstanding Natural Area or other title was not considered necessary for protecting this area.

311-14: See response to comment 311-3.

311-15: See response to comment 192-7.

311-16: Under the *Preferred Alternative*, no increases in grazing or new rangeland improvements would be allowed on the Cactus Plain portions of the Nine-Mile and Ganado allotments unless it can be shown that no adverse impacts to the area's natural values and wilderness values would result.

The Cactus Plain area is proposed for special management. Only those rangeland developments that are consistent with maintenance of this area's unique plant community and the stability of the dune ecosystem would be authorized.

311-17: The *Preferred Alternative* has been revised to read "maintain good and excellent rangeland condition on an average of 67% of the acreage."

311-18: During dry years when little ephemeral vegetation is present, grazing is not authorized on ephemeral allotments. When wet years occur and it is determined by an authorized officer that enough forage is available for both wildlife and livestock, grazing is authorized on a case-by-case basis. The number of livestock and period of grazing use are subject to multiple-use objectives in the RMP and subsequent activity plans. As a general rule, ephemeral stocking rates are based on 50% utilization of the projected available forage. The remaining 50% is allocated to wildlife. However, our experience has shown that livestock has used only 10-30% of the overall forage that has been available when ephemeral grazing has been authorized.

Ephemeral allotments are monitored using a series of photo-points taken every other year.

311-19: The land acquisitions proposed for the benefit of unique natural values are all located within or immediately adjacent to areas proposed for special management area status. In addition, a majority of the acquisitions for wildlife habitat purposes are within or adjacent to proposed priority wildlife habitat areas. Accordingly, these acquired lands would be subject to the same management prescriptions described in the *Preferred Alternative* for Issues 1 and 2.

311-20: All new major transmission facilities would be restricted to designated corridors wherever feasible. The only exceptions would be those facilities which require special spacing or have other unusual requirements which preclude locating in a designated corridor. Facilities to be located outside designated corridors would be identified in the environmental analysis of the right-of-way granting process.

In addition, local distribution facilities, i.e., powerlines less than 69 kV, telephone lines to individual homes or subdivisions, or county and private roads, etc., cannot logically be restricted to corridors. These actions are handled on a case-by-case basis as described in *Management Guidance Common to All Alternatives* (Chapter 2).

311-21: See response to comment 214-2.

311-22: See response to comment 10-2.

311-23: The word "significant" has been replaced with "adverse" in the final RMP-EIS.

311-24: The two areas mentioned in the text (the Parker race course and Ehrenberg Sand Bowl) are competitive use areas. Copper Basin Wash Sand Dunes and Crossroads, as shown on Map 2, are other areas that have been designated under the Open-Intensive ORV use category (see Table

2-7) in the *Preferred Alternative*. Map 2 is correct as printed; the dots west of Laguna Dam and north of the Wellton-Mohawk Valley reflect Yuma District boundary revisions and are unrelated to ORV designations.

311-25: The *Preferred Alternative* provides for the designation of non-collection areas through recreation activity plans and associated environmental analyses. The purpose of this second tier of planning is to provide for site-specific decisions in greater detail than is possible in the RMP. As stated in the *Preferred Alternative,* areas with important or high wildlife values and areas where recreational use has nuded an area will be designated as non-collection areas through the recreation activity plans.

311-26: Summary Table S-2 is the same as Table 2-11 (Table 2-12 in the draft). Both tables summarize the impacts that would result from implementing the various plan alternatives. The statement on page xiii of the draft was intended to refer to the projected impact on range forage production or grazing capacity that would result over the long term from implementation of the *Preferred Alternative*. Grazing use would not be increased initially, but range forage production would increase by approximately 94% in the long term as a result of allotment management plans, range improvements and grazing systems that would be developed and applied under this alternative. Accordingly, we believe the statement in Tables S-2 and 2-11 is correct.

To avoid future misinterpretations of this type, the statement in Tables S-2 and 2-11 has been revised to read: "Forage production would increase by 3,756 AUMs....."

Please refer to the discussions of impacts on wildlife habitat from grazing that appear in Chapter 4 for a full explanation of impacts under the *Preferred Alternative* and *Alternatives B* and *D*.

311-27: Adding all the acreages for these areas will total more than 412,520 acres because the priority wildlife habitat area, special management area and wilderness overlap each other in some places. Please note that the above total is from the draft and is changed in the final because of changes that have been made in the *Preferred Alternative*.

311-28: While not summarized in Table 2-11 (2-12 in the draft EIS), economic impacts from increased recreational development under the *Preferred Alternative* are discussed in *Impacts of the Preferred Alternative*.

311-29: Statistics for backcountry use and firewood collection are not readily available. While some information is available for specialized uses such as deer hunting, BLM is unaware of any general backcountry recreation use figures maintained by state wildlife agencies or any other entity or individual. BLM welcomes any additional data which may be added to either the RMP or the MSA.

We believe our general statements in Chapter 3 concerning backcountry recreation use and firewood collection are sufficient for analyzing and deciding among the alternatives in the RMP-EIS. Backcountry recreation use accounts for a relatively small amount of the total recreation use in the Yuma District. The continual decrease of "dead and down" wood at heavily used recreation sites indicates that firewood is a declining resource.

311-30: The description of Yuma Desert has been revised.

311-31: Data on population stability and numbers are not appropriate to the level of analysis and decision-making contained in the RMP-EIS. These data are more appropriately used in development of site-specific habitat management plans (HMPs). BLM coordinates closely with state wildlife agencies and other interested groups and individuals during preparation of HMPs. (See also response to 215-1.)

311-32: State-listed wildlife species are listed in *Appendix E*. The appendix has been revised to correct listing status of the razorback sucker.

311-33: The statement under *Raptors* in Chapter 3 refers to recent short-term trends in raptor populations. The long-term trend has been one of decline. Once-abundant species, such as the peregrine falcon, elf owl and Harris' hawk, have vanished or become so reduced in number that their status in the district has become jeopardized. However, recent species reintroductions and habitat improvements have served to halt decline and, for some species, increase or reestablish populations.

The statement in Chapter 3 has been changed to "currently stable" to indicate the recent trend.

311-34: BLM will include an implementation priorities schedule in the Record-of-Decision for the RMP.

311-35: As indicated in Chapter 1, the life of the plan is ten to twenty years. The RMP will be revised or amended based on the needs for change as indicated by monitoring. (See *Monitoring the Resource Management Plan*, Chapter 2.)

311-36: BLM considers priority wildlife habitat and special management area designations under all alternatives to generally benefit wildlife by restricting allowable uses and protecting habitat conditions. The specific details of beneficial impacts are described in the analyses of *Impacts on Wildlife* for each alternative. While it is true that mineral and energy development and some other uses may occur or be allowed in priority wildlife habitat and SMAs, the impacts from these specific actions will be analyzed and mitigated on a case-by-case basis in accordance with the *Wildlife and Fisheries Program* and *Environmental Program* sections of *Management Guidance Common to All Alternatives* (Chapter 2).

311-37: The impacts of RMP decisions on wildlife outside of priority wildlife habitat or special management areas are described in the *Impacts on Wildlife* sections for each alternative.

311-38: The text and *Appendix E* have been revised to reflect this and other comments.

311-39: BLM considers the level of analysis for grazing impacts to be adequate for selecting among the RMP alternatives. Further substantive analyses would not aid in RMP level decision-making or change the decisions at this time.

The *Preferred Alternative* proposes no initial change in grazing stocking rates in part because the resulting impacts are difficult to ascertain. Grazing would be monitored to determine adjustments that might become necessary to achieve resource management objectives established in the RMP and subsequent activity plans.

Future adjustments in stocking rates or grazing management practices would be made if and when monitoring indicates a change is needed to protect the Cactus Plain and La Posa Plain ecosystems. In addition, the site-specific impacts from grazing actions not specifically projected in this RMP would be analyzed on a case-by-case basis as described in the *Environmental Program* section of *Management Guidance Common to All Alternatives* (Chapter 2). For these reasons, we do not believe a "worst case" analysis to be necessary.

311-40: In the absence of a specific need for any further measures, BLM considers the mitigating measures for impacts of RMP management actions on wildlife to be adequate.

Mitigating measures for impacts from actions not specifically projected in the RMP will be developed by BLM on a site-specific basis as part of the environmental process described in the *Environmental Program* section of *Management Guidance Common to All Alternatives* (Chapter 2). As part of this process, BLM will consult with the U.S. Fish and Wildlife Service and other appropriate agencies.

311-41: *Appendix E* has been revised.

311-42: See response to comment 215-5.

311-43: See response to comment 214-1.

316-1: See response to comment 212-1.

316-2: None of the Yuma District RMP decisions would either affect the Gila River floodplain or be affected by flood flows in the Gila River. Consequently, detailed consideration of potential Gila River flooding in the RMP is not necessary.

BLM will continue to coordinate proposals involving the Gila River floodplain with the U.S. Army Corps of Engineers on a case-by-case basis.

317-1: See response to comment 218-2.

326-1: See response to comment 10-10.

326-2: The difference between formal designation as an ACEC, Outstanding Natural Area or other designated title, and management under "special prescriptions to protect natural values" is minor; both measures will protect the area's natural or cultural values.

Several factors combined to warrant formal designations for Crossman Peak and the Big Marias. These factors include: a) a high potential for serious conflict, b) the significance of the natural and cultural values involved and c) a high public visibility and opinion in favor of designation. With the exception of Cactus Plain, the potential conflicts, values and public opinion relative to the other non-designated SMAs referred to in this comment are not nearly as high. BLM believes that management under the special prescriptions described in the *Preferred Alternative* will provide adequate protection for the unique natural values in these areas.

See response to comment 311-13 for a description of our rationale for not formally designating Cactus Plain.

326-3: See response to comment 10-6.

326-4: See response to comment 311-5.

326-5: See response to comment 215-5.

326-6: The cumulative effect of new rights-of-way developments (in designated utility corridors) on bighorn sheep migration will be included as part of the RMP implementation and monitoring plan described in *Management Guidance Common to All Alternatives* (Chapter 2).

326-7: We recognize the deficiencies in the "apparent trend in rangeland condition" concept. At present, this is the most accurate information we have for making range management decisions. "Apparent trend" is BLM's best professional estimate of range trend. The lack of valid and reliable data is a primary reason that we have chosen not to change the present stocking rate in allotments. The 1980-81 range condition inventory is presently being augmented by more recent survey data through on-going monitoring studies in order to provide a more accurate estimate of trend. These monitoring studies will be used to determine future range management adjustments that may be necessary to meet the overall RMP objectives (see *Rangeland Monitoring* section of *Management Guidance Common to All Alternatives*).

326-8: While they are available to some extent, data on the amount of fishing, boating and hunting use in the Yuma District are not necessary for the comparison of impacts from alternatives in the recreation issue, or for the level of management decisions being made in the RMP. The data currently included in Chapter 3 of the RMP are considered adequate for these needs.

326-9: The text has been revised to reflect (the possibility of competition between livestock and mule deer for seasonal forage. However, we do not believe that the competition or impacts would be significant. Both deer and livestock occupy a large area in such a low density that there is sufficient forage and space to distribute the competition to such a degree that it is minimal. Moreover, in accordance with 43 Code of Federal Regulations (CFR) 4110.3-1, BLM can permit additional livestock grazing to utilize seasonal forage only when such use would be consistent with other multiple use management objectives.

326-10: The sentence on bighorn sheep use of the Bill Williams River has been deleted.

326-11: The text has been revised to reflect the correct status of this species.

326-12: The text has been revised to read: "Migratory and upland game birds....."

326-13: The Bill Williams River has been added to this section.

326-14: Recreation expenditures as reflected by sales receipts for selected retail trade and service sectors have been used to indicate economic importance and impact in the RMP-EIS. User day values are another means for accomplishing the same thing.

326-15: The text has been revised to reflect the correct status of this species.

326-16: The *Preferred Alternative* does not establish an increase of 3,756 AUMs as a goal. The statement in Chapter 4 reflects the projected impact on overall forage production from implementation of the proposed grazing management. As such, there is no contradiction between this statement and objectives established in the Buckskin Mountains-Cactus Plain HMP. Any future adjustments in livestock grazing use — increases or decreases in stocking rates — will be made based on monitoring studies and consideration of management objectives for other resources and uses.

326-17: Designation of Cactus Plain as a special management area or wilderness would not affect the total grazing capacity (AUMS) in terms of forage production on the Ganado and Nine-Mile allotments. The projected overall increase in AUM production for these two allotments was based on professional estimates by BLM range specialists.

326-18: The Bureau of Land Management has no management authority on the Colorado River, and is unable to regulate recreation use on the water.

Furthermore, in many places, including the Parker Strip, the BLM does not manage enough of the shoreline to effectively regulate access to the Colorado River.

Water safety issues are certainly a matter of concern for the BLM as well as other governmental agencies. While the BLM can restrict water access developments such as boatramps in its recreation concession areas, the real need is for a coordinated approach to regulating all recreational use of the lower Colorado River. Although we coordinated closely with other land and water managing agencies in developing this RMP, decisions regarding implementation of a coordinated approach to Colorado River management is beyond the scope of the plan.

326-19: The La Posa Plain has had grazing use for many years. The Lower Gila South Inventory (1980-81) indicated that this area is generally in excellent condition with a static trend; this does not indicate a negative effect on the vegetative community. The *Preferred Alternative* does not propose an initial increase in livestock numbers, but its implementation would result in increased forage production overall as projected in Chapter 4.

326-20: The description on page 98 of the draft EIS of impacts on wildlife from grazing was in error and has been revised in the final.

326-21: *Appendix E* has been revised.

343-1: No attempt has been made to allocate a percentage of available forage to wildlife in the RMP. However, the impacts on wildlife were considered in developing and selecting a *Preferred Alternative*. Monitoring, as described in the *Range Program* section of *Management Guidance Common to All Alternatives* (Chapter 2), would determine the accuracy of impact projections made in this EIS. Adjustments to grazing systems and preference would be made where necessary, based on the results of monitoring.

Projected forage production under each of the alternatives is discussed as part of the impacts analysis in Chapter 4 of the RMP-EIS. Typical grazing systems that would be applied to allotments are described in Appendix G-7.

343-2: The *Disposals* section of *Management Guidance Common to All Alternatives* (Chapter 2) has been revised to include "riparian habitat" as a condition which would preclude transferring lands within a disposal area from Federal ownership. In addition, Area 9 has been deleted from the list of areas identified for disposal under the *Preferred Alternative*.

A1-1: See response to comment 52-1.

A2-1: See response to comment 52-1.

A9-1: The BLM estimate may be conservative, but this estimate does not significantly affect the conclusions drawn about the economic impacts from implementation of the various recreation alternatives.

A10-1: See response to comment 213-1.

B29-1: See response to comment 146-1.

C1-1: Areas referenced in this comment appear to be included in the proposed expansion of the Kofa National Wildlife Refuge. If this is the case, none of the issues addressed in the Yuma District RMP would affect the continued multiple use of these lands.

C2-1: See response to comment 228-3.

C3-1: Mineral potential has been documented in the Yuma District RMP only to the extent necessary for assessing impacts and losses of resource values that would result from proposed management actions.

C11-1: See response to comment 96-1.

C12-1: See response to comment 96-1.

C14-1: See response to comment 219-3.

C14-2: See response to comment 228-7.

C14-3: As indicated in *Impacts on Vegetation* from the *Preferred Alternative*, the adverse impacts on candidate T&E cacti from concentrating long-term camping in LTVAs would be offset by the overall benefit to these and other sensitive plant species from prohibiting long-term camping elsewhere in the Yuma District.

C14-4: The *Preferred Alternative* proposes to manage all remaining riparian areas along the Colorado River as priority wildlife habitat areas. Management for this use would prohibit encroachment on and degradation of riparian habitat from recreation development. In addition, the *Preferred Alternative* states under *Management of Concessions and Leases* that proposed recreation developments which have potential to adversely impact natural values would either not be allowed or effects would be mitigated.

The *Preferred Alternative* also states that the expansion of recreation areas along the Colorado River would be contingent upon demonstrating feasibility and need for the project through economic, market and environmental analyses (see *Issue 6: Recreation - General*). Expansion would be further constrained by restricting recreation development within the floodplain (see *Recreation Management in Floodplains*), and by managing remaining riparian areas along the river as priority wildlife habitat areas (see *Riparian Areas*).

C14-5: See response to comment 10-10.

C14-6: The Land Ownership Adjustments map (Map 9) depicts areas in which BLM-administered lands would be available for disposal. Some of these areas include a variety of land ownership and administration. Map 9 should be used in conjunction with Map 6 (Land Status) in order to determine the extent and location of BLM-administered lands in each of the disposal areas.

C14-7: See response to comment 215-15.

C16-1: See response to comment 187-1.

D3-1: Since wilderness has been eliminated as a planning issue in this final EIS, none of the management actions under the *Preferred Alternative* would result in the withdrawal of additional acreage in the Yuma District from mineral entry. The 5,280-acre Big Marias area is presently under Bureau of Reclamation withdrawal.

D3-2: See response to comment 202-1.

D3-3: See response to comment 265-5.

D4-1: We recognize both the shortage of facilities and the environmental impacts resulting from wood collection in the La Posa area. These as well as other issues are currently addressed in an area-specific or activity plan for the La Posa LTVA.

The *Preferred Alternative* provides the option for BLM to provide additional facilities, expand recreation sites and designate specific wood non-collection areas. The specific details will be left to activity plans, as stated under the *Recreation Program* section of *Management Guidance Common to All Alternatives* (Chapter 2).

Following approval of the RMP, activity plans will be prepared for the Long-Term Visitor Areas as well as other special use areas in the district to ensure consistency with RMP decisions and objectives. The activity plans for LTVAs will address both sanitation and wood collection.

D5-1: All remaining riparian areas administered by BLM are included in the 23,100 acres that would be managed as priority wildlife habitat under the *Preferred Alternative*. Please note that the acreage was 25,000 acres in the draft EIS, but is changed in the final to take into account the Cocopah land transfer passed by Congress after the draft was published.